

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 13

CX/PR 23/54/15-Add.1

June 2023

**ORIGINAL LANGUAGE ONLY**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

54<sup>th</sup> Session

Beijing, P.R. China

26 June - 1 July 2023

### ENHANCEMENT OF THE OPERATIONAL PROCEDURES OF CCPR AND JMPR

#### Comments in reply to CL 2023/39-PR

*Comments of Brazil, Canada, Costa Rica, Egypt, European Union (EU), Iraq, Kenya*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/39-PR<sup>1</sup> issued in April 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

#### Explanatory notes on the appendix

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

<sup>1</sup>

<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
<p><b>CRITERIA FOR PERIODIC REVIEWS:</b> CCPR should extend the period of periodic review in the Codex Procedural Manual for 25 years, especially for the non-toxic pesticides and compounds without public health concern, if the GAP remains unchanged the Codex MRLs should be retained.</p> <p><b>CCPR SUPPORT EXTRA JMPR MEETINGS:</b> Whenever necessary CCPR should support extra face-to-face JMPR meetings to increase the capacity of review. However, this action should be in conjunction with other actions like virtual meetings.</p> <p><b>VIRTUAL MEETINGS:</b> Even though different time zones are challenged for virtual meetings. This type of meeting should be used in a way to accelerate/potentialize the number of evaluations. Two hours meeting twice a month may provide an excellent result, especially for less complex evaluations, and could be attended by all members of JMPR.</p> <p>Additionally, JMPR could pre-assess the data provided to avoid waste of time with incomplete dossiers and after starting the evaluation provide an opportunity for the data sponsors to clarify concerns for the expert evaluators.</p> <p>Furthermore, it is paramount that JMPR expands its number of experts. One way to achieve this goal can be by tween programming for the development of new experts. Maybe JMPR invites retired members to be responsible for this activity and give an additional hand to evaluate for more one or two years while making the supervision of new potential members. These new potential members should be selected by a demanding process to filter excellent professionals.</p>	Brazil
<p>BACKGROUND</p> <ul style="list-style-type: none"> <li>At CCPR53 (2022), concerns were raised that the current CCPR/JMPR system is unable to keep up with global demand for the evaluation of new compounds, uses, and periodic reviews. While the most recent deliberation at CCPR53 was prompted by the cancellation of JMPR meetings following the Covid 19 pandemic, the growing demands on JMPR and its implications have been an important topic of discussion at several previous sessions of CCPR.</li> <li>Most notably, FAO/WHO commissioned a 2002 review of the working procedures of JMPR5 that was reviewed at CCPR34 and the JMPR 2002 Regular Meeting.</li> <li>In its review of the 2002 FAO/WHO report, CCPR34 confirmed that “JMPR was essential to the continued independent international evaluation of pesticide residues” but raised similar concerns that the increased demands on JMPR has resulted in a process that “had become unsustainable and without additional resources the system would fail sooner, rather than later.”<sup>6</sup> JMPR re-iterated these concerns at its 2002 regular meeting, but also cautioned that making changes to the operational procedures of JMPR “requires considerable resources and the implementation could become counter-productive if it is no more than the introduction of one suggested change after another without an overall strategic direction.”</li> <li>JMPR 2002 then concluded by recommending that FAO, WHO, and the Codex Alimentarius Commission prepare a strategic plan that can serve as a framework for future changes.</li> <li>There have been continued discussions on the increased demands on JMPR since FAO/WHO’s 2002 report was published, but a strategic plan was never developed to guide future changes to JMPR. Therefore, CCPR is now revisiting whether there is a need to enhance the operational procedures of CCPR and JMPR and what associated opportunities and challenges may arise from these changes. This information will be used by CCPR and JMPR to further explore how to improve the existing system to meet current and future demand for JMPR evaluations.</li> </ul>	Canada

COMMENT	MEMBER/OBSERVER
<p>CANADA'S POSITION</p> <ol style="list-style-type: none"> <li>1. Canada would like to acknowledge the eWG's continued efforts in preparing the discussion paper which explores enhancements to the CCPR and JMPR procedures.</li> <li>2. Canada is in general agreement with the recommended work plan/schedule which includes as a first step that CCPR54 submit the paper to JMPR, for consideration at its meeting in September 2023, together with the summary of the discussion that took place at CCPR54, based on comments received in reply to CL 2023/39-PR, and any additional recommendations (if any) for consideration. <ol style="list-style-type: none"> <li>a. However, Canada cautions that, as noted in CX/PR 23/54/15, in addition to the discussions/decisions on the new compounds, periodic evaluations and new uses, JMPR is required to consider and address various General Considerations items, which are typically discussed towards the end of the meeting leaving little time for an in-depth analysis.</li> <li>b. Considering the importance of seeking enhancements to operational procedures of CCPR and JMPR, more time would be required at the September meeting to explore and identify initial priorities for such enhancements. One option would be to postpone the review of various new uses to the 2024 JMPR. Alternatively, FAO and WHO expert panels can dedicate a few days ahead of the regular meeting to develop a strategic plan that can serve as a framework for future changes. These additional days added to the regular Meeting would not be precedent-setting, as this was the approach taken in 2015 when EFSA held a 2-day Scientific Workshop, cosponsored by WHO and FAO, prior to the regular 2015 Meeting, to revisit the IESTI equations.</li> </ol> </li> </ol>	
<p>Costa Rica agradece la oportunidad de emitir los siguientes comentarios generales:</p> <p>En la página 10, en el apartado de Estructura organizativa, dotación de personal y recursos de la JMPR, en el cuadro de fondos:</p> <p>Costa Rica recomienda hacer referencia sólo a organismos internacionales, tal como se referencia en diferentes documentos del Codex.</p> <p><u>Justificación:</u> La relación gobierno y nombres propios de organizaciones internacionales, genera divergencia de criterios entre los gobiernos y en este caso específico, podría interpretarse como posibles conflictos de interés entre la industria y la JMPR.</p> <p>En la página 14 en el tema de Alcance de las evaluaciones y LMR por defecto, se indica en el texto la posibilidad de establecer un LMR por defecto (como 0,01 mg/kg) si no hay problemas de exposición alimentaria para los casos de nuevos compuestos.</p> <p>Costa Rica considera que, se debe inducir un debate de manera que se incluya las ventajas o desventajas que representa.</p> <p><u>Justificación:</u> Para muchos países de Latinoamérica se debe adoptar en primera instancia los LMR de Codex y en el caso que Codex no tenga un LMR establecido se cuenta en su legislación con la posibilidad de adoptar un LMR de otros países.</p> <p>Si se establece un LMR de 0,01 mg/kg en Codex se estaría limitando la posibilidad de escoger otro LMR superior que cuente otro país como por ejemplo la Agencia de Protección Ambiental de los Estados Unidos, lo que limitaría el comercio de productos. Además, otra desventaja que consideramos es que un LMR en el límite de cuantificación o por default es muy difícil de cumplir para el agricultor, se debe analizar la molécula para determinar si esta estaría siendo utilizada en etapas tempranas del cultivo para asegurar el cumplimiento del LMR.</p> <p>En las páginas 10 y 11, en el apartado de Estructura organizativa, dotación de personal y recursos de la JMPR, Costa Rica quisiera proponer lo siguiente:</p> <p>Estructura organizacional:</p> <p>Crear grupos de expertos regionales que apoyen la gestión de la JMPR. De esta manera se podría conformar una revisión por región que tendría la ventaja de que la JMPR contrate expertos regionales los cuáles evaluarían los datos de residuos de los ensayos, lo cual aliviaría la carga de trabajo a la JMPR.</p> <p><u>Justificación:</u> de esta manera la JMPR tendría más oportunidad para revisar los datos toxicológicos. Se tendría además la ventaja de que al ser la revisión por regiones se revisarían los cultivos que interesan a la región y solucionarían la necesidad de nuevos LMR más rápidamente (habría que buscar la manera de no repetir el trabajo para cultivos que sean de interés para varias regiones o coordinar entre regiones para la evaluación correspondiente).</p>	<p><b>Costa Rica</b></p>

<b>COMMENT</b>	<b>MEMBER/OBSERVER</b>
Costa Rica apoya el calendario y recomendaciones propuestas por el GTe.	
Egypt appreciates the work done in the document & agrees on it	<b>Egypt</b>
The EU agrees with the work plan/schedule proposed.	<b>EU</b>
Agree with regards	<b>Iraq</b>
Kenya supports the recommendation and the proposed workplan and possible schedule to enhance operational procedures of CCPR and JMPR.	<b>Kenya</b>