

# 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 Items 3, 4(a), 4(b), 5(a), 6.1, 6.2, 6.3, 7, 10 and 11

PR56/CRD11

September 2025

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

56th Session

Santiago, Chile

8-13 September 2025

*Comments submitted by Kenya*

### Agenda Item 3

CX/PR 25/56/2

#### Matters referred to CCPR by CAC and/or other subsidiary bodies

**Comment:** Kenya takes note of the matters for information arising from CAC, CCEXEC relevant to the work of CCPR, and other subsidiary bodies, i.e., CCCF on prioritization of EtO and 2-CE for evaluation by JECFA, CCMAS on the revised Guidelines on Sampling (CXG 50-2004) and their apps (e-book), and CCRVDF on work on Eis. Further, Kenya notes that other recommendations arising from CAC and/or CCEXEC about provision of scientific advice to CCPR unsupported compounds, and coordination of work between CCPR and CCRVDF will be considered under the relevant agenda items (i.e., Agenda items 5a, 8.1, and 11, respectively).

Kenya commits to taking leadership roles in committee working groups and will endeavor to provide input to the monitoring framework for the Codex Strategic Plan 2026–2031.

Kenya agrees with the proposed changes to Section 4.8 of the Codex Procedural Manual as presented by CCGP.

**Rationale:** The proposed changes will ensure consistency in the wording of the Risk Analysis Principles with the intention of addressing the editorial issues in the existing principles and aligning with Section 2 of the PM without altering the provisions of the Risk Analysis Principles applied by CCPR.

### Agenda Item 4(a)

CX/PR 25/56/3

#### Matters arising from FAO and WHO

##### General Comment

Kenya welcomes the updates provided by FAO and WHO and supports ongoing initiatives to improve pesticide management and online pesticide sales, strengthen pesticide specifications, address emerging food safety risks such as environmental inhibitors, and adopt innovative tools such as New Approach Methodologies (NAMs). Kenya also supports efforts to enhance feed safety risk assessment and encourages the timely development of harmonized international guidance, especially in areas that affect smallholder farmers, export-oriented value chains, and public health. Kenya further requests that planned activities be shared by FAO through Codex to ensure effective participation.

Kenya emphasizes the importance of and welcomes opportunities for capacity-development and inclusive guidance: particularly in addressing minor uses, microbial pesticides, feed contaminants, and emerging technologies; to ensure equitable implementation across developing countries and ensure full utilization of their benefits.

##### Rationale:

Kenya's national food safety and trade priorities are closely aligned with Codex objectives. The outlined activities contribute to the safe use of pesticides, protect consumers, facilitate access to international markets, and support sustainable agricultural practices. Ongoing collaboration and harmonization under the Codex framework are essential to strengthen global food safety and trade resilience. The development of FAO/WHO specifications for microbials is important as they support a shift to biopesticides which are safer alternatives for human and environmental health.

## Agenda Item 4(b)

CX/PR 25/56/4

## Matters arising from other international organizations

## Comment

Kenya appreciates the comprehensive update on the activities of the Joint FAO/IAEA Centre of Nuclear Techniques in Food and Agriculture and commends its ongoing technical support to member countries, particularly through capacity building, analytical method development, and supervised residue data generation. Kenya acknowledges the Centre's continued efforts in aligning its work with Codex priorities, specifically those of the Codex Committee on Pesticide Residues (CCPR), and submits the following comments:

1. **General support for FAO/IAEA Work:** Kenya **supports** the activities of the Joint FAO/IAEA Centre, especially the initiatives that directly contribute to enhancing national and regional capacities in pesticide residue monitoring, data generation, and risk-based food control systems. Kenya welcomes the Centre's technical cooperation projects (TCPs), coordinated research, and capacity development work, as these initiatives contribute to our goals of enhancing food safety, strengthening trade competitiveness, and safeguarding consumer health.
2. **Support for regional initiatives in Africa:** Kenya **supports** the African Food Safety Network (AFoSaN) and acknowledges the value of regional cooperation in promoting harmonized analytical capacity and method transfer. We particularly commend the successful organization of the **African food safety workshop (Marrakech, October 2024)** and its thematic focus on standards, accreditation, pesticide residue testing, and capacity building. Kenya **supports the continuation and expansion** of these biennial workshops and **expresses interest in co-hosting future AFoSaN events** or technical working sessions in collaboration with the Joint FAO/IAEA Centre.
3. **Data generation for MRLs:** Kenya **confirms its active participation** in the ongoing regional project *RAF5091 – Enhancing Human and Analytical Capacities for Food Safety Standards*, including data generation for setting **Codex MRLs for okra and chili peppers**, as discussed under CCPR55 and again under Agenda Item 6.3. Kenya participated in the a regional training course on Good Laboratory Practice for Conduct of Supervised Field Trials - Minor Crops. This work is vital for Kenya's horticultural export sector, especially for crops not yet fully covered by Codex MRLs but of growing regional trade significance.
4. **Laboratory capacity and analytical methods:** Kenya welcomes the development and validation of **supercritical fluid chromatography-mass spectrometry (SFC-MS/MS)** for multi-residue detection, particularly for complex matrices such as **maize, cassava, and millet**, which are staple crops in Kenya. Kenya appreciates that this method reduces matrix effects and improves reproducibility compared to conventional LC-MS techniques.

Kenya encourages the Joint FAO/IAEA Centre to:

- Expand training on SFC-MS/MS analytical methods to more reference laboratories in Africa.
- Provide open access to validated methods through the **Food Contaminant and Residue Information System (FCRIS)** platform.
- Consider piloting SFC-MS/MS technology in African regional reference laboratories, including in East Africa.

5. **Future Recommendations;** Kenya recommends the following to CCPR and FAO/IAEA:

- a. **Continued investment** in supervised residue trial data generation for crops of regional importance (e.g., indigenous vegetables, pulses, tropical fruits);
- b. **Sustained technical assistance** for establishing Codex MRLs where gaps exist, with priority given to minor crops of economic value;
- c. **Increased access** to training opportunities for national regulators, scientists, and laboratory staff.
- d. **Support for implementation** of the harmonized national residue monitoring, data sharing and reporting framework.

**Agenda Item 5(a)****Section 2 of the 2024 JMPR Report****Report on items of general consideration arising from the 2024 JMPR meeting****General Comment**

Kenya welcomes the advancements made in the JMPR 2024 general considerations and supports the continued improvement of methodologies for pesticide evaluation, particularly the adoption of the Global Estimate of Chronic Dietary Exposure (GECDE-mean).

**Rationale:**

Kenya recognizes that the shift from IEDI to GECDE-mean improves dietary exposure assessments by better representing actual intake levels across various population groups, including vulnerable communities. Further, Inclusion of the GECDE-high will ensure the protection of consumers with a range of consumption patterns within different populations.

**Agenda Item 6.1****CX/PR 25/56/5****MRLs for pesticides in food and feed (at Steps 7 and 4)****General Comment**

Kenya supports the recommendations by JMPR following evaluation of 37 pesticides including the proposed Maximum Residue Levels (MRLs).

**Agenda Item 6.2****CX/PR 25/56/6****CXLs for milk and milk fat****General Comment**

Kenya appreciates the Codex Secretariat's efforts to improve consistency and transparency in the application of MRLs for milk and milk fat.

**Specific Comments****(i) Confirmation of the 2008 decision of CCPR40 and implementation of the monitoring note**

**Position:** Kenya supports the recommendation to confirm and implement the decision of CCPR40 that:

"For monitoring and regulatory purposes, whole milk is to be analyzed, and the result compared to the MRL for whole milk."

Kenya recommends that CCPR requests CCMAS to assist in developing a harmonized method for separating and analyzing residues in milk and milk fat.

**Rationale:**

- Kenya agrees that this note provides much-needed clarity to laboratories and regulatory authorities on how to interpret MRLs for milk and milk fat, particularly for fat-soluble compounds.
- Implementation of this footnote will help avoid regulatory inconsistencies in MRL enforcement, both at the domestic level and in international certification for exports.
- Developing harmonized methods for separating and analyzing residues in milk and milk fat will address the issue of co-extraction of aqueous residues when solvent extraction is used, which can interfere with the results.

**Agenda Item 6.3****CX/PR 25/56/7****MRLs for okra****General Comment**

Kenya appreciates the ongoing efforts by the Codex Committee on Pesticide Residues (CCPR) and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) to ensure science-based establishment and extrapolation of MRLs for minor crops such as **okra**, **martynia**, and **roselle**.

**Specific Comment:** Kenya agrees with the recommendation of Codex's current arrangement to provisionally extend the CXLs for the pepper's subgroup (VO 0051) to okra, martynia, and roselle, dependent on data generation commitment for submission to JMPR to conduct the evaluation. Kenya supports CCPR to request for data from members and observers for evaluation by JMPR through issuance of a Circular Letter (CL).

**Rationale:** Okra is a popular vegetable in Kenya, where it is also produced, consumed and traded. Once the CXLs are established, they will help with approvals for registration and use as well as monitoring pesticide residues in food control systems and therefore help to ensure food safety and facilitate regional and international trade

#### **Agenda Item 7**

**CX/PR 25/56/8**

#### **Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage (at Step 7)**

##### **General Comment**

Kenya appreciates the work done by the EWG Chaired by India and co-chaired by Iran, Canada and Singapore alongside member countries that participated in advancement of the guidelines. Kenya recognizes the critical importance of reference materials (RMs) in the accurate determination of pesticide residues in food. Reliable RMs underpin compliance with Codex MRLs, reinforce consumer protection, and support our export-driven agricultural sector. Kenya welcomes the proposed guidelines and supports their development and progression in the Codex step process.

##### **Rationale**

The development of the guideline will balance scientific integrity with feasibility for laboratories in resource-constrained settings by reducing the costs of laboratory operations and disposal of the RMs and Stock Solutions.

#### **Agenda Item 10**

**CX/PR 25/56/12**

#### **Enhancement of the operational procedures of CCPR and JMPR**

##### **General Comment**

Kenya appreciates the efforts of the Electronic Working Group (EWG) to enhance collaboration between the Codex Committee on Pesticide Residues (CCPR) and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR). Kenya recognizes the critical role of JMPR in establishing Codex Maximum Residue Limits (CXLs), which are essential for ensuring food safety and facilitating international trade. Kenya supports the proposed short-term approaches that aim to improve the efficiency, responsiveness, and inclusivity of the JMPR process: particularly those addressing the growing evaluation backlog, while upholding the core objective of consumer protection.

#### **Agenda Item 11**

**CX/PR 25/56/13**

#### **Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF Working Group on Compounds for Dual Use – Status of work**

##### **Comment**

Kenya appreciates the work done by the Joint CCPR/CCRVDF EWG including the various activities conducted such as identification of dual-use compounds. Further, Kenya

- i. indicates its continued support for the Joint CCPR/CCRVDF EWG;
- ii. endorses scheduling a virtual session of the Joint EWG that precedes a virtual Joint Session of CCPR and CCRVDF;
- iii. commits to participate in the possible virtual session of the Joint EWG and possible virtual Joint Session of CCPR and CCRVDF.

##### **Rationale**

The proposed mechanisms of holding the joint virtual session of the Joint EWG that precedes a virtual Joint Session of CCPR and CCRVDF will expedite the joint harmonization of the identified food descriptors and the harmonization of MRLs for dual-use compounds.