

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3, 4(a), 4(b), 5(a), 5(b), 6.1, 6.2, 6.3, 7, 8.1, 8.2, 9, 10, 11

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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 Uganda

Uganda appreciates the opportunity to provide comments on the different agenda items to be discussed by the 56th session of the Codex Committee on Pesticide Residues.

Agenda Item 3

CX/PR 25/56/2

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

Uganda takes note of the matters for information referred by CAC, CCEXEC and other subsidiary bodies.

We reaffirm our commitment and support to work being done by Codex and will keep track of the events mentioned in the report and will participate in the work by the committee.

The Uganda is in agreement with the proposed changes to Section 4.8 of the Codex Procedural Manual as presented by CCGP

RATIONALE:

- i. The agenda item is for information purposes
- ii. 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 Procedural manual 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

Uganda appreciates the FAO and WHO for the work done including the activities of Joint Meeting on Pesticide Management (JMPM) and the activities of the Joint Meeting on Pesticide Specification (JMPS)

Uganda welcomes and accepts the manual on feed safety risk assessment that will provide clarity, help harmonize currently applied methodologies and encourages the timely development of harmonized international guidance, especially in areas that affect smallholder farmers, export-oriented value chains, and public health.

Uganda welcomes the idea to update the International Program for Chemical Safety (IPCS) manual to include a new chapter focusing on the use of "New Approach Methodologies (NAMs), emphasizing animal-free testing methods

Uganda also notes with appreciation the FAO report on food safety implications of environmental inhibitors i agri-food systems, which provides valuable insight for national and global food safety strategies

Uganda advocates for continued support in building local and National capacities and expanding resources to address these issues comprehensively. Uganda additionally 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:

- i. The manual is meant to provide clarity while harmonizing the applied methodologies. This aims to integrate NAMs into future scientific advice and regulatory practices.
- ii. 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 are important as they support a shift to bio pesticides which are safer alternatives for human and environmental health

Agenda Item 4(b)

CX/PR 25/56/4

Matters arising from other international organizations

Uganda appreciates the work done by the FAO and IAEA in their extensive capacity-building efforts, particularly in enhancing laboratory infrastructure and competencies across the continent. These initiatives are crucial for Uganda as well as Africa, enabling accurate monitoring and regulation of pesticide residues and related food safety hazards, thus safeguarding public health and facilitating compliance with international food safety standards. African Union encourages the continuation and expansion of such programs to further strengthen Africa's capabilities in food safety management.

Uganda would appreciate the continued support from CCPR and FAO/IAEA in the following areas:

- a) Supervised residue trial data generation for crops of regional importance
- b) 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) Implementation of the harmonized national residue monitoring, data sharing and reporting framework
- e) Piloting SFC-MS/MS technology in African regional reference laboratories

RATIONALE

These activities are crucial for Uganda in terms of enabling accurate monitoring and regulation of pesticides residues and safety hazards thus safeguarding public health and facilitating compliance with international foods safety standards.

Agenda Item 5(a)

Section 2 of the 2024 JMPR Report

Report on items of general consideration arising from the 2024 JMPR meeting

Uganda agrees with the section 2 of the 2024 report submitted by JMPR. However, Uganda would like to further recommend that there should be transparency throughout the transition process from the use of the IEDI methodology to the GECDE methodology and that the issues arising from conservation be well addressed. In addition, Uganda would also like to recommend more capacity building in this area during the transition.

Justification:

Uganda notes that the gradual transition from the IEDI methodology to the GECDE methodology for estimating chronic dietary exposure provides the potential to provide more accurate assessments reflective of diverse consumption patterns. This is aligned with efforts to enhance the scientific rigor and relevance of pesticide residue assessments in regional contexts and to ensure that global standards are effectively tailored to meet public health and safety requirements.

Agenda Item 5(b)

Section 3 of the 2024 JMPR Report

Report on responses to specific concerns raised by CCPR arising from the 2024 JMPR meeting

Uganda appreciates the JMPR for being able to comprehensively address the issues raised in the concern forms and agrees with the outcome of their conclusions on the matters raised. We would also like to note the public health concerns on the leaf lettuce and spinach in the JMPR report of 2022 and if possible, an alternative GAP should be identified in future to address this concern.

Justification:

Uganda recognizes the outcomes of the JMPR 2024 evaluations, which confirmed that there were no exceedances of the Acceptable Daily Intakes (ADIs) or the Acute Reference Doses (ARfDs) with the proposed Maximum Residue Limits (MRLs). This finding underscores the protective nature of the established MRLs with respect to public health and will ultimately promote international trade.

Agenda Item 6.1

CX/PR 25/56/5

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

Uganda appreciates the work done by JMPR and for undertaking the risk assessment of pesticide/commodity combinations for both toxicological and residue data provided from several studies. Uganda is in support of the recommendations by JMPR following evaluation of 37 pesticides including the proposed Maximum Residue Levels (MRLs):.

Rationale:

Uganda takes note of the JMPR 2024 evaluations, which confirmed that there were no exceedances of the Acceptable Daily Intakes (ADIs) or the Acute Reference Doses (ARfDs) with the proposed Maximum Residue Limits (MRLs).

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

Uganda supports the decision taken by CCPR40 (2008) to insert a note “for monitoring and regulatory purposes, that whole milk is to be analyzed, and the result compared to the MRL for whole milk” to the CXLs for milk in the Codex database in all cases where CXLs are established for fat-soluble pesticides in both milk and milk fat; and also the request made to JMPR to insert this note alongside the MRL for whole milk in all cases where MRLs were established for both milk fat and whole milk for fat-soluble pesticides.

The problem arises for pesticides with intermediate fat solubility if the milk fat tested is not physically separated from milk leading to inflated measurements in the milk fat. Uganda proposes a need to build capacity for members to enable them with new methods that would generate consistent measurements. monitoring and regulatory purposes, that whole milk is to be analysed, and the result compared to the MRL for whole milk” to the CXLs for milk in the Codex database in all cases where CXLs are established for fat-soluble pesticides in both milk and milk fat; and also, the request made to JMPR to insert this note alongside the MRL for whole milk in all cases where MRLs were established for both milk fat and whole milk for fat-soluble pesticides. The problem arises for pesticides with intermediate fat solubility if the milk fat tested is not physically separated from milk leading to inflated measurements in the milk fat.

Uganda proposes a need to build capacity for members to enable them with new methods that would generate consistent measurements. monitoring and regulatory purposes, that whole milk is to be analysed, and the result compared to the MRL for whole milk” to the CXLs for milk in the Codex database in all cases where CXLs are established for fat-soluble pesticides in both milk and milk fat; and also, the request made to JMPR

to insert this note alongside the MRL for whole milk in all cases where MRLs were established for both milk fat and whole milk for fat-soluble pesticides. The problem arises for pesticides with intermediate fat solubility if the milk fat tested is not physically separated from milk leading to inflated measurements in the milk fat. Uganda agrees with the recommendation to build capacity for members to enable them with new methods that would generate consistent measurements.

Uganda further proposes that CCPR requests CCMAS to assist in developing a harmonized method for separating and analyzing residues in milk and milk fat.

Rationale:

The insertion of the footnote to the schedule will help overcome the technical challenges faced by many laboratories using analytical methods that are not appropriate for separating fat from milk without also extracting residues from the non-fat portion of the sample being tested

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

Uganda supports 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. Uganda supports CCPR to request for data from members and observers for evaluation by JMPR through issuance of a Circular Letter (CL).

Uganda appreciates the Global Pulse Confederation; Global Minor Use Foundation for the support accorded to the selected African countries currently conducting field trials to generate data that will be submitted to JMPR for evaluation.

Rationale:

Okra is a popular vegetable in the EAC Africa, where it is also produced and consumed. 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)**

Uganda thanks the EWG chaired by India and co-chaired by Canada, Iran and Singapore and all the member countries who participated in the advancement of this work. Uganda recognizes the critical importance of reference materials (RMs) and related stock solutions in the accurate determination of pesticide residues in food. Uganda supports the final adoption of the proposed guidelines at step 8 at CAC48.

Rationale:

Reliable RMs underpin compliance with Codex MRLs, reinforce consumer protection and support export-driven agricultural sector. The guidelines will support laboratories to overcome the challenges faced while monitoring the stability of reference materials and related stock solutions of pesticides during prolonged storage. It will also contribute to reliability, cost reduction and efficiency of pesticide residue monitoring in food control systems and therefore help to ensure food safety and facilitate regional and international trade.

Agenda Item 8.1**CX/PR 25/56/9****Management of unsupported compounds without public health concerns scheduled for periodic review**

Uganda appreciates the chair and co-chair for the work of EWG chaired by Chile and co-chaired by Australia, Ecuador and Kenya on the Management of Unsupported Compounds without Public Health Concern. .

Uganda would like to support the recommendation of the EWG to revoke all CXLs for parathion-methyl, dinocarp and bitertanol. However, Uganda does not support the revocation of CXLs for amitraz, fenthion and methamidophos.

Justification:

The three compounds are still in use in agricultural production in the EAC and they are used to control pests, ectoparasites and their revocation would impact food security and livelihoods. Additionally, revoking the CXLs for the three compounds would not ensure effective monitoring for possible excessive use of these compounds in agricultural production.

The country and the region at large have been facing multi acaricide resistance by Ticks especially to co-formulations. Amitraz is a dual use compound and is registered in many countries, and currently the compound is the mostly widely used mono molecule for the control of resistant ticks. In order to safeguard and promote public health, it's advisable to maintain the CXLs for Amitraz (122) and the proposal presented to the CCRVDF counterparts through the Joint CCPR/CCRVDF EWG for a harmonized position.

Agenda Item 8.2**CX/PR 25/56/10****National registrations of pesticides**

Uganda appreciates the EWG chaired by Chile and co-chaired by Australia, India, and Kenya and all the member countries who participated in the advancement of this work and the on-going modifications and improvements of the format and content of the database and analysing information on the National Registration Database (NRD). There is need to explore the real reasons for the lack of interest in the participation of the continued development of the NRD.

Uganda does not support the suspension of the NRD-related works and calls for a much more refined and efficient means that facilitates improvements in the data collection and analysis in the national registration of pesticides. There is a need for Codex members to appreciate and build capacity by re-emphasizing the value of the FAO Pesticide Registration Toolkit.

Uganda would also like to welcome the potential for supporting Member States in developing functional National Registration Databases.

Justification:

Uganda recognizes the NRD as a vital tool for monitoring, managing and enforcing compliance with pesticide residue regulations, as well as sharing of information among Member States thereby safeguarding public health, facilitating fair trade and supporting evidence-based policy decisions.

A national registration database for pesticides is crucial for protecting human health, the environment, and agriculture as it ensures that pesticides used in a country are in a database that acts as a central repository of information on registered pesticides, facilitating informed decision-making by regulatory agencies, researchers, and other stakeholders for Public Health Protection, International Cooperation and Transparency and Accountability

Agenda Item 9**CX/PR 25/56/11****Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR**

Uganda commends the EWG chaired by Australia and all the member countries who participated in the advancement of this work. Uganda supports the proposed schedules and priority lists of pesticides provided on; new Compounds, New uses and periodic review.

Uganda appreciates the opportunity to submit comments on the 2026 proposed schedules and priority list for 2027 and beyond with the following specific comments:

- i. Uganda agrees with the EWG work in developing the list and supports the proposed schedules and priority list of pesticides as provided in the circular letter on new compounds, new uses and periodic review.
- ii. Uganda further takes note and appreciates the work done by the EWG regarding the new use compounds proposed for the 2027 evaluation and beyond and recommends the addition of 10 compounds from the '2026 new use – other' reserve list.

Justification:

Uganda is committed to contributing to the priority list for 2027 and beyond for evaluation by JMPR.

Once registered, the compounds will be useful in managing weeds, pests and diseases for the target commodities. Additionally, most of the listed compounds have met the 15-year rule and are due for evaluation.

Agenda Item 10**CX/PR 25/56/12****Enhancement of the operational procedures of CCPR and JMPR**

Uganda appreciates the United States and the other EWG co-chairs for leading this work.

Uganda recognizes the critical role of JMPR in establishing CXLs, which are essential for ensuring food safety and facilitating international trade.

Uganda 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.

Justification:

The EAC acknowledges that the timely establishment and revision of CXLs is essential to ensuring consumer health protection, supporting fair trade and enabling the safe use of innovative crop protection tools. The persistent backlog of new use evaluations and periodic reviews compounded by resource constraints, undermines these objectives and limits the ability of Codex members to respond to emerging food safety needs.

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**

Uganda appreciates the chair and co-chair for the EWG and all the member countries who participated in the advancement of this work.

Uganda supports the initiatives of the Joint CCRVDF-CCPR Working Group and agrees with the proposal to convene a Virtual Joint Physical Working Group that will discuss the current terms of reference (ToRs).

Uganda supports the scheduling of a virtual session of the Joint EWG that precedes a virtual Joint Session of CCPR and CCRVDF..

Uganda commits to participate in the possible virtual session of the Joint EWG and possible virtual Joint Session of CCPR and CCRVDF.

Active participation in the work of the Joint EWG working in liaison with the veterinary counterparts

Providing replies to the circular letters on harmonization of food descriptors (CL 2025/47-PR/RVDF) and harmonization of MRLs for dual-use compounds (CL 2025/48-PR/RVDF).

Justification:

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.

This approach will reduce procedural delays caused by the sequential review and modification of recommendations, thereby strengthening the efficiency and impact of Codex work.

Alignment between CCPR and CCRVDF on compounds with dual use strengthens One Health approach, prevents regulatory conflicts and safeguards consumer protection.