

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 1, 3, 4(a), 4(b), 5(a), 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 East African Community (EAC)

The East African Community (EAC) Secretariat 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 1

CX/PR 25/56/1

Adoption of the agenda

The EAC proposes that CCPR56 adopts the provisional agenda as its agenda for the 56th Session.

Agenda Item 3

CX/PR 25/56/2

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

The EAC notes the matters for information referred by CAC, CCEXEC and other subsidiary bodies.

The EAC 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 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

The EAC expresses its appreciation to FAO and WHO on the matters arising including the activities of Joint Meeting on Pesticide Management (JMPM) and activities of the Joint Meeting on Pesticide Specification (JMPS).

The EAC 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.

The EAC further 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.

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

The EAC 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

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 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**

The EAC appreciates the work relevant to CCPR undertaken by FAO and International Atomic Energy Agency (IAEA) centre

The EAC notes the extensive capacity-building efforts, particularly in enhancing laboratory infrastructure and competencies among Codex Member States.

The EAC 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 the EAC region 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**

The EAC agrees with the section 2 of the 2024 report submitted by JMPR. However, EAC 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, EAC would also like to recommend more capacity building in this area during the transition.

RATIONALE

The gradual transition from the IEDI methodology to the GECDE methodology for estimating chronic dietary exposure provides the potential for 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 6.1**CX/PR 25/56/5****MRLs for pesticides in food and feed (at Steps 7 and 4)**

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

RATIONALE

The EAC 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**

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

The EAC supports the recommendation that CCPR56 confirm the decision of CCPR40 to insert the note: "For monitoring and regulatory purposes, whole milk is to be analysed, and the result compared to the MRL for whole milk" into the Codex Maximum Residue Limits (CXLs) for milk in all cases where CXLs are established for fat-soluble pesticides in both milk and milk fat.

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

The EAC welcomes the opportunity to build capacity for members to enable them with application of new methods

that would generate consistent measurements.

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

The EAC appreciates the ongoing efforts by CCPR and the JMPR to ensure science-based establishment and extrapolation of MRLs for minor crops such as okra, martynia, and roselle.

The EAC supports the Codex's approach 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.

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

The EAC appreciates the Global Pulse Confederation; Global Minor Use Foundation for the support accorded to the selected African countries to conduct field trials.

RATIONALE

Okra is a popular vegetable in EAC, where it is produced, consumed and traded. Once the CXLs are established, they will support 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)

The EAC appreciates the comprehensive work of the EWG, chaired by India and co-chaired by Canada, Iran, and Singapore and acknowledges the incorporation of significant improvements in the revised document.

The EAC recognizes the critical importance of reference materials (RMs) and related stock solutions in the accurate determination of pesticide residues in food. The EAC 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

The EAC appreciates 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.

The EAC would like to support the recommendation of the EWG to revoke all CXLs for parathion-methyl, dinocarp and bitertanol.

The EAC does not support the revocation of CXLs for amitraz, fenthion and methamidophos.

RATIONALE

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.

Agenda Item 8.2

CX/PR 25/56/10

National registrations of pesticides

The EAC appreciates the work of the EWG in compiling and analyzing information on the National Registration Database (NRD).

The EAC does not support the suspension of work related to the NRD 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.

The EAC would welcome the potential for supporting Member States in developing functional National Registration Databases.

RATIONALE

The EAC 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.

Agenda Item 9

CX/PR 25/56/11

Establishment of Codex schedules and priority lists of pesticides for evaluation/re-evaluation by JMPR

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

- a. The EAC 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.
- b. The EAC 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.

RATIONALE

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

The EAC appreciates the efforts of EWG chaired by the United States of America and Co- chaired by Costa Rica and Uganda to enhance collaboration between CCPR and JMPR.

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

The EAC 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.

RATIONALE

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

The EAC appreciates the Joint CCPR/CCRVDF EWG on compounds for dual use chaired by USA and co-chaired by Brazil and New Zealand.

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

The EAC 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.

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.