

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 8.2

CX/PR 25/56/10-Add.1

September 2025

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Fifty-sixth Session

Santiago, Chile

8 - 13 September 2025

NATIONAL REGISTRATIONS OF PESTICIDES

Comments in reply to CL 2025/40-PR

submitted by

Brazil, Canada, Chile, Colombia, Egypt, Ghana, India, Somalia, United Arab Emirates, Uruguay

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/40-PR¹ issued in July 2025. 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 Annex

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>

ANNEX**GENERAL AND SPECIFIC COMMENTS**

COMMENT	MEMBER / OBSERVER
<p>Brazil supports the recommendation to temporarily suspend the work on the National Registration Database (NRD), given the low response rate and regional imbalance in contributions, which hinder the ability to draw representative global conclusions.</p> <p>Brazil also agrees that the NRD initiative may be resumed on an ad hoc basis, particularly in support of assessments of unsupported compounds that do not present public health concerns.</p> <p>Furthermore, Brazil encourages a review of the process for collecting data through electronic means, including improvements in the communication flow with member countries, to ensure better engagement in future initiatives related to pesticide registration data.</p> <p>The low level of participation in the electronic working groups may be partially attributed to the operational dynamics of the electronic forum. Currently, member countries need to frequently and proactively log into the forum to check whether new documents or comments have been posted. This system is not efficient and may lead to missed contributions.</p> <p>It is recommended that an automated notification or alert system be implemented. Countries registered in electronic working groups should receive an email notification whenever a new document is uploaded or when input is requested. Such a system would greatly improve participation, ensure timely engagement, and enhance the effectiveness of the work being conducted through EWGs.</p>	Brazil
<p>Canada thanks the EWG on the National Registration Database for their leadership on this initiative.</p> <p>Canada offers the following comments:</p> <ol style="list-style-type: none"> Canada notes that the overall number of responding countries has been low, understanding that populating the NRD has been quite resource-intensive. While Canada acknowledges the importance of the work on the NRD, Canada agrees with the recommendation to suspend future work at this time, but agrees with ad hoc requests when considering future unsupported compounds without public health concerns. 	Canada
<p>La delegación de Chile agradece el trabajo realizado por el grupo de trabajo por medios electrónicos, y apoya suspender el trabajo relacionado con la BDRN hasta que sea necesario apoyar solicitudes específicas de información sobre compuestos sin apoyo que no son motivo de preocupación en materia de salud pública, tal como se estipula en las recomendaciones presentadas en el párrafo 14. (i) del documento del programa CX/PR 25/56/10.</p>	Chile
<p>Sì, estamos de acuerdo con solicitar punto de vista de los miembros del Codex.</p> <p>No estamos de acuerdo con la suspensión el trabajo relacionado con la BDRN</p>	Colombia

COMMENT	MEMBER / OBSERVER
<p>Egypt notes that, despite having submitted its national lists, we were unable to find Egypt's lists reflected in the document.</p> <p>Egypt agrees with this proposal to suspend the NRD-related work until it becomes necessary to support specific requests for information on unsupported compounds with no public health concern.</p>	Egypt
<p>Ghana calls for a much more refined and efficient means that facilitates improvements in the data collection and analysis in the national registration of pesticides and for that reason support the continuation of the NRD-related works.</p> <p>Rationale: A national registration database for pesticides is crucial as a source of information on registered pesticides, facilitating informed decision-making by regulatory agencies, researchers, and other stakeholders for public health protection, international cooperation, transparency and accountability.</p>	Ghana
<p>Training sessions may be conducted in virtual mode for all the Codex member countries to enable the filling of the NRD excel sheet. Such capacity-building efforts would enable members across all regions to provide relevant information, thereby ensuring consistency and minimizing regional bias in the NRD.</p> <p>India would like to emphasize that NRD serves an important global dataset of the status of the national registration of the pesticides across the different geographies. The results of the NRD database are important inputs for risk management decisions on pesticides to ensure smooth trade of food commodities globally.</p>	India
<p>The Federal Republic of Somalia appreciates the work of the Electronic Working Group (EWG), chaired by Chile and co-chaired by Australia, India, and Kenya, with the assistance of Germany, in compiling and analyzing information on the National Registration Database (NRD). Somalia does not support the suspension of work related to the NRD.</p>	Somalia
<p>1. Input from Regional Codex Committees: Encourage establishment of regional NRD coordination through the Codex Regional Committees to aggregate data before submission to the EWG.</p> <p>2. Creation of Simplified Submission Interface: Consider transitioning from Excel-based templates to webbased forms or portals with dynamic support, which could improve user experience and data quality.</p> <p>3. Capacity Building: Provide technical training and multilingual guidance for Codex contact points to encourage broader participation, especially in underrepresented regions.</p> <p>Ad Hoc Activation of the NRD: Support the concept of activating NRD data collection only in response to specific Codex needs, such as evaluations of unsupported compounds with no public health concerns. This targeted, demand-driven approach would help avoid unnecessary data requests and reduce member fatigue.</p> <p>United Arab Emirates (UAE) suggests to currently suspend the NRD-related work until it becomes necessary to support specific requests for information on unsupported compounds with no public health concern. Some of the reasons are:</p>	United Arab Emirates

COMMENT	MEMBER / OBSERVER
<p>a. The low response rate (only 11 of 27 EWG members) and regional imbalance, as noted in CX/PR 25/56/10, that compromises the NRD's representativeness and utility. It is to mention that UAE actively participated actively in the work on National Registration of Pesticides by responding to Circular letters: CL 2023/25-PR, CL 2023/86-PR and CL 2024/46-PR.</p> <p>b. UAE agrees that resources should be allocated more effectively, focusing on ad hoc reviews when there are specific requests related to unsupported compounds without public health concerns.</p> <p>c. This approach is consistent with a risk-based prioritization model and helps reduce regulatory burden on Codex Members.</p>	
<p>Uruguay agradece el trabajo realizado por Chile como presidente del Grupo Electrónico copresidido por Australia, India y Kenia, con la asistencia de Alemania sobre Registros Nacionales de Plaguicidas.</p> <p>Uruguay está de acuerdo con las conclusiones incluidas en los párrafos 10 a 13 del documento. El número de respuestas recibidas continúa siendo muy bajo y no se logra recabar información adecuada y representativa por regiones.</p> <p>Se apoya la recomendación (i) de suspender el trabajo relacionado con la base de datos de Registros Nacionales hasta que sea necesario respaldar solicitudes específicas de información sobre compuestos no respaldados que no representan un riesgo para la salud pública.</p> <p>Con respecto a la recomendación (ii) valorando los esfuerzos realizados en la obtención de un formato de Planilla Excel que incluye la clasificación de cultivos y el proceso de aprendizaje por parte de los estados miembros que han avanzado en completar el mismo, se sugiere que éste se emplee al recabar la información específica de los compuestos sin apoyo que se traten dentro del grupo electrónico.</p>	Uruguay