

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 10

CX/PR 25/56/12-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

ENHANCEMENT OF THE OPERATIONAL PROCEDURES OF CCPR AND JMPR

Comments in reply to CL 2025/45-PR

submitted by

*Australia, Brazil, Canada, Chile, Colombia, Egypt, Ghana, India,
Iran (Islamic Republic of), Saudi Arabia, Thailand, CropLife International*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/45-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 COMMENTS**

COMMENT	MEMBER/OBSERVER
Australia thanks the chairs and co-chairs of the electronic working group on the enhancement of work between CCPR and JMPR for their continued work.	Australia
<p>Brazil acknowledges the relevance of the discussion on enhancing the operational procedures of CCPR and JMPR, especially considering the increasing demand for the establishment of Codex Maximum Residue Limits (CXLs). We welcome the work of the Electronic Working Group (EWG) and support the continued efforts to strengthen the system's efficiency and responsiveness.</p> <p>Brazil notes the importance of a balanced approach, combining short-term solutions with a long-term vision for sustainable improvements in the review process.</p> <p>Brazil also emphasizes the need to ensure that any enhancements to CCPR and JMPR procedures are implemented in a manner that maintains scientific integrity, transparency, and equitable participation of all Codex Members. Capacity-building initiatives should be considered to enable broader engagement and support from national authorities.</p> <p>Additionally, Brazil suggests evaluating the potential use of artificial intelligence (AI) tools to optimize JMPR's analysis processes, aiming to improve efficiency, consistency, and the timely delivery of evaluation outcomes, while maintaining scientific rigor and quality standards.</p> <p>Brazil reiterates its commitment to supporting initiatives that strengthen Codex processes and promote fair, science-based international trade. We remain available to contribute to further discussions and collaborative efforts under the CCPR framework.</p>	Brazil
Canada would like to acknowledge the EWG's continued efforts in recommending enhancements of the operational procedures of CCPR and JMPR.	Canada
<p>La delegación de Chile agradece el trabajo realizado por el grupo de trabajo por medios electrónicos, y se permite realizar los siguientes comentarios, respecto de las recomendaciones presentadas en el párrafo 10 del documento del programa CX/PR 25/56/10:</p> <p>Los esfuerzos que se han realizado a través de otro grupo, permiten relevar la importancia del trabajo de evaluación de riesgos que realiza la JMPR, siendo fundamental para el funcionamiento del CCPR</p>	Chile
Egypt agrees with the document and proposes that the mechanism for its implementation be studied through the electronic working group.	Egypt
Thailand thanks the EWG for its dedicated work and valuable contributions.	Thailand
CropLife International would like to express gratitude to the Enhancement EWG, chaired by the United States of America and co-chaired by Costa Rica and Uganda. While EWG-3 has fulfilled its terms of reference, CropLife International supports the re-establishment of EWG-4 to focus on implementing the proposals that have garnered support from Codex members and observer organizations.	CropLife International

SPECIFIC COMMENTS

COMMENT	MEMBER/OBSERVER
Organization of extraordinary meetings of JMPR (ToR-i) to reduce the backlog of new use evaluations (i.e., additional MRLs for existing compounds not scheduled for periodic reviews nor complete evaluation by JMPR)	
<p>CX/PR/25/56/12 Appendix I acknowledges that the JMPR doubts that additional meetings will increase outputs over the long term. Australia has the same opinion because irrespective of the number of JMPR meetings in any given year, the same JMPR resources (JMPR experts) are available. As Chair of the electronic working group on the establishment of the schedules and priority lists of pesticides for evaluation/re-evaluation by the JMPR, Australia acknowledges that there remains a backlog of nominations for new uses or re-evaluations of existing compounds but have observed that the backlog is decreasing. The value of convening an extraordinary meeting of JMPR is therefore questioned.</p>	Australia
<p>Brazil supports the idea of convening extraordinary meetings of JMPR focused on the evaluation of new uses, provided that:</p> <ul style="list-style-type: none"> - Resources and staffing are secured transparently; - The scope and candidate substances are clearly defined in collaboration with Codex members and stakeholders; - The process avoids duplication of efforts or overlap with periodic reviews. <p>Such meetings could contribute to reducing the current backlog and improve timely access to CXLs needed for trade and food safety.</p>	Brazil
<p>Canada continues to support convening an extraordinary meeting of JMPR to address the backlog of new uses, provided that:</p> <ul style="list-style-type: none"> • there are sufficient experts that would be available to attend this extra meeting, without compromising their contributions to the yearly JMPR meeting • nominations for review are carefully screened to ensure dossiers are complete, contain the required registered GAP(s), and do not introduce new information requiring major revisions to residue definitions; and • any additional MRL recommendations generated do not exceed the capacity of CCPR to consider them efficiently. <p>However, as noted by the EWG, at present there is no mechanism to support convening an extra meeting of JMPR.</p> <p>Canada encourages continued discussion on mechanisms to contribute financial and human resources in order to explore the possibility of convening extra meetings in the future, to reduce the backlog of new use evaluations.</p>	Canada
<p>Chile apoya la realización de una reunión extraordinaria de la JMPR para abordar exclusivamente los nuevos usos, y a su vez, manifiesta la preocupación por la falta de financiamiento para que esta instancia pueda ser materializada.</p>	Chile

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<p>La propuesta del subcomité de CCPR es realizar evaluaciones escalonadas para optimizar el tiempo de la reunión extraordinaria, se podría implementar un proceso de evaluación en dos fases:</p> <p>Fase 1 (pre-reunión): Un equipo técnico (formado por miembros del grupo de trabajo) realiza una revisión preliminar de los paquetes de datos. Esto incluye la verificación de la integridad de los datos y la preparación de un resumen ejecutivo para cada caso. Este trabajo preparatorio reduce el tiempo de deliberación durante la reunión principal.</p> <p>Fase 2 (reunión extraordinaria): Los miembros de la JMPR revisan los resúmenes y se centran en los aspectos científicos clave que requieren debate. Al evitar la revisión de datos básicos, la reunión puede ser más eficiente y abordar un mayor número de evaluaciones.</p> <p>Nota: se debe tener en cuenta el mecanismo de priorización de evaluación de los nuevos usos y los requisitos del grupo técnico que participaría en la primera fase.</p>	Colombia
<p>India supports this recommendation that extraordinary meetings of JMPR for new use evaluations (i.e., additional MRLs of existing compounds not scheduled for periodic reviews nor complete evaluation by JMPR) will help to reduce the backlog.</p> <p>Rationale: Fixing of higher number of Codex MRLs for existing pesticides on additional crops will ensure food safety and smooth trade.</p>	India
<p>It is recommended to include a concise executive summary at the beginning of this section, specifying the core challenges, proposed actions, and decisions being sought from CCPR.</p> <p>APPROACH TO ENHANCE THE OPERATIONAL PROCEDURES OF CCPR AND JMPR</p> <p>Short-term Approaches with Decision Boxes to enhance.....</p>	Iran (Islamic Republic of)
<p>Thailand agrees with the proposed short-term approach, noting that convening a special JMPR meeting would help reduce the backlog of new compound evaluations. It is therefore essential to consider appropriate ways of allocating the necessary resources to facilitate the organization of such meetings, including the recruitment of permanent JMPR staff, as proposed by CropLife International.</p>	Thailand
<p>CropLife International fully endorses the proposal put forth by the EWG regarding ToR (i). An extraordinary meeting of JMPR to address the backlog of new use evaluations appears to be an effective approach to enhance JMPR activities. In terms of financial support, in PR54/CRD17 submitted to CCPR54 in June 2023, CropLife International has proposed a transparently organized “fee system”, which could also be utilized to help fund an additional JMPR meeting.</p>	CropLife International

COMMENT	MEMBER/OBSERVER
Design and implementation of targeted projects to improve JMPR's evaluation process (ToR-ii), such as those described in Appendices I and II	
<p>Australia supports the second short-term proposal put forward in CX/PR 25/56/12, Appendix I, to complete a targeted project that improves JMPR's evaluation process and also see's merit in the project proposed by Croplife International to provide guidance to submitters of data to JMPR (CX/PR 25/56/12 Appendix II). Australia considers that these two pieces of work, to improve JMPR's evaluation process and to provide guidance to submitters of data to JMPR, are related and could be combined or conducted in parallel.</p> <p>With regards to providing guidance to data submitters, Australia considers that it could be best to provide this guidance by updating the relevant JMPR documents. Many improvements to JMPR risk assessment procedures have been introduced since the third edition of the 'Manual on the Submission and Evaluation of Pesticide Residue Data' (2016) and the 'Training Manual on Evaluation of Pesticides Data for the Estimation of MRLs in Food and Feed' (2012) were published.</p> <p>Australia considers that more information about CropLife International proposal for 'Permanent JMPR Staff' (CX/PR 24/55/12, Appendix II) is required.</p>	Australia
<p>Brazil supports the development of targeted projects, particularly those focused on improving:</p> <ul style="list-style-type: none"> - The quality and timeliness of data submission; - Standardization of dossier formats and digital submission; - More efficient use of current JMPR resources. <p>We believe that structured guidance and training for data submitters, as suggested in the CropLife proposal, could reduce resubmission rates and improve evaluation efficiency.</p> <p>In addition, Brazil highlights the importance of establishing clear timelines, progress indicators, and feedback mechanisms for targeted projects, ensuring that improvements are measurable and that lessons learned can be incorporated into future procedures.</p> <p><u>Appendix II – CropLife International Proposals</u></p> <p>Brazil acknowledges the relevance of the two proposals submitted by CropLife International and finds merit in:</p> <ul style="list-style-type: none"> - Establishing a pilot program to support JMPR through contracted staff for drafting initial reviews. - Publishing practical guidance for data submitters to improve dossier quality and alignment with JMPR expectations. <p>These initiatives could complement current FAO/WHO efforts and enhance the efficiency and predictability of JMPR evaluations, provided they are implemented with transparency and oversight.</p>	Brazil
<p>Canada notes the proposals to enhance the efficiency and capacity of JMPR through:</p> <ol style="list-style-type: none"> a. the development of electronic data submission and data quality standards, b. the establishment of permanent JMPR staff, and c. the preparation of a guideline for submitters of data. 	Canada

COMMENT	MEMBER/OBSERVER
<p>Canada reiterates that timely submission of complete, high-quality dossiers remains critical to improving JMPR's efficiency. Adherence to existing submission deadlines would allow experts to screen data for completeness and, if necessary, substitute compounds from the reserve list where dossiers are ready for review.</p> <p>Canada supports initiatives to standardize data formats for submissions, for example, the use of OECD-recommended formatting and naming conventions, to reduce administrative burden and allow JMPR experts to focus on scientific assessment rather than data assembly.</p> <p>Canada also supports efforts to develop detailed guidance for data submitters, as this could complement electronic submission systems and improve overall dossier quality. Canada recognizes that establishing permanent JMPR staff could provide stability and continuity in the preparation of initial review documents, support efficient use of expert time during JMPR meetings, and help ensure consistent application of scientific and procedural standards. We welcome further discussion on the potential implications and resource requirements of such an initiative.</p> <p>Canada notes that additional resources would be required to implement the project proposals. However, there is currently no mechanism to fund these improvements to data submission processes.</p>	
<p>Finalmente, se apoya la propuesta de la organización observadora para el mediano plazo, indicando que respecto al primer punto "Orientación para los remitentes de datos a la JMPR", el texto resultante debiera aplicarse como piloto para realizar los ajustes necesarios, y posteriormente trabajarlo como una "Directriz" en base a los procedimientos establecidos por el Codex Alimentarius.</p>	Chile
<p><u>Appendix I, Potential Short-term Approaches to Enhance the Operational Procedures of CCPR and JMPR, 2024 – 2026</u></p> <p>Saudi Arabia supports the steps outlined for the short-term approaches. Regarding Step 2 (Complete a targeted project that improves JMPR's evaluation process), under the second point, we propose a minor editorial amendment: to replace 'detailed the scope of work and impact on JMPR's evaluation process, and' with 'detail the scope of work and impact on JMPR's evaluation process.</p> <p><u>Appendix I, Potential Long-Term Approaches to Enhance the Operational Procedures of CCPR and JMPR, 2026 - 2028</u></p> <p>Saudi Arabia agrees with the steps as presented and has no further comments.</p>	Saudi Arabia
<p>In addition, Thailand foresees the advantages of the proposal to recruit permanent JMPR staff to draft preliminary reports for use by JMPR experts, while emphasizing the importance of securing sufficient budgetary support and carefully considering the qualifications and expertise of the staff to be hired.</p> <p>Moreover, Thailand supports the proposal to develop a guideline for data submission to JMPR, with the aim of addressing issues related to poor-quality documentation. We noted that it should be clearly determined whether such guidelines would cover the submission of Supervised Residue Trials (SRT) data or toxicology data. Moreover, since FAO has already established guidelines for the submission of SRT data for JMPR evaluations, any new guidelines intended for SRT data should be detailed, consistent with, and non-duplicative of FAO's existing guidelines.</p>	Thailand

COMMENT	MEMBER/OBSERVER
<p>Concerning ToR (ii), CropLife International would like to reiterate its support for the two proposals. The first project, aimed at providing guidance to data submitters to JMPR, has progressed with the publication of a guidance document, part of the CropLife International “Working with the JMPR and CCPR - Manual for the Agrochemical Industry”. A side-event on this topic is organised during the CCPR56 meeting to allow relevant stakeholders to exchange further on the best practices in submitting complete dossiers in support of JMPR evaluations.</p> <p>Regarding the establishment of permanent JMPR staff, CropLife International welcomes any feedback on this initiative and is prepared to assist the EWG in identifying resources and developing a mechanism for its implementation.</p>	CropLife International
Development of other potential activities that CCPR could advance without changes to the procedures and policies of FAO and WHO applicable for the operation of JMPR not considered in the short-term approach presented in Appendix I	
<p>Brazil encourages further exploration of options that do not require changes in FAO/WHO procedures but can still support the short-term enhancement goals, such as:</p> <ul style="list-style-type: none"> - Strengthening collaboration between national authorities and JMPR experts; - Exploring remote participation or document-sharing platforms to enhance pre-meeting preparation and document review; - Assessing the feasibility of integrating AI-assisted tools for data processing, dossier screening, and preliminary analysis to support expert review. 	Brazil
<p>Ghana supports the approach recommended in the EWG report.</p> <p>Rational: Ghana is of the opinion that this will facilitate CCPR in reviewing feedback from JMPR and subsequently devising a long-term approach for establishing priorities and crafting an implementation roadmap.</p>	Ghana