

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 - www.codexalimentarius.org

Agenda items 7 (a, b, c, d), 8, 9, 12, 13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

54th Session
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Comments submitted by Philippines

Agenda Item 7a

CL/2023/34-PR

Revision of the Classification of Food and Feed:

Class B – Primary food commodities of animal origin (all types) and

Class E- Processed foods of animal origin (all types)

POSITION

The Philippines agrees to Agenda Item 7a pertaining to the revised Classification of Food and Feed (CXA 4-1989) under Class B – Primary food commodities of animal origin (all types) and Class E – Processed foods of animal origin (all types), as presented in Appendices I and II to CX/PR 23/54/6. The Philippines generally supports the agreements of the Electronic Working Group (EWG) and its principles in revising the classification as stated in paragraphs 1-5 of CX/PR 23/54/6. It was noted that no amendments would be made to existing CXLs until the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) reviews were completed in accordance with established procedures for the development of Codex schedules and pesticide priority lists.

The Philippines endorses the improved classification in Class B as proposed by the EWG particularly the addition of a new type “Miscellaneous primary food commodities with animal origin” to include honey and other bee products in the list. Class B will be divided into 6 types, 18 groups, no reserved groups and, 65 subgroups. The Philippines also agrees with the revised Class E such as the addition of two groups Dried avian muscle and other avian products (previously group 081 Reserved) and Group 083 Secondary invertebrate food commodities of animal origin. The proposed composition of Class E is 4 types, 10 groups, and 13 subgroups.

REASON

The listed commodities are found to be sufficient and applicable to the current needs of the country. There are no additional commodities that the Sub-committee on Pesticide Residue (SCPR) would like to include or transfer to other groups/subgroups as stated in Appendices I and II. Furthermore, the enhanced classification in Class B is more comprehensive and provides a clearer scope of the groupings of primary and processed food commodities of animal origin.

Agenda Item 7b

CL/2023/34-PR

Revision of the Classification of Food and Feed:

Tables on examples of representative commodities for commodity groups in different types under Class B – primary food commodities of animal origin and Class E – processed foods of animal origin

POSITION

The Philippines supports the Agenda Item 7b about the Revision of the Classification of Food and Feed: Tables on examples of representative commodities for commodity groups in different types under Class B and Class E, as shown in Appendices I and II to CX/PR 23/54/7 (for inclusion in the Principles and Guidance for the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups (CXG 84-2012)).

The Philippines generally agrees to the proposed examples of representative commodities for the revised Class B and E as well as Tables 9 and 10. It is considered that other representative commodities may be chosen based on established regional disparities in dietary consumption and production. Furthermore, the EWG emphasized in its evaluation that it is not possible to select a group CXL for some because of the wide variety of commodities within those groups.

REASON

Currently, there are no additional commodities that the Sub Committee on Pesticide Residue would like to include or transfer to other groups/subgroups as stated in Appendices I and II, as well as in the EWG proposal on the examples for the selection of representative commodities for Class B and Class E based on the discussion, conclusions, and recommendations provided under Agenda Items 7a and 7b.

Agenda Item 7c and 7d

CL/2023/35-PR

Revision of the Classification of Food and Feed:

Portion of the commodity to which MRLs apply, and which is analyzed for Group 006 assorted tropical and sub-tropical fruits – inedible peel and Group 023 oilseeds

POSITION

The Philippines agrees with the consensus to implement the following revisions of the Classification of Food and Feed on the portion of commodity to which the MRLs apply, and which is analyzed for Group 006 assorted tropical and sub-tropical fruits – inedible peel and Group 023 oilseeds and oil fruits:

- Group 006 Assorted tropical and sub-tropical fruits - inedible peel

Portion of the commodity to which the MRL applies (and which is analyzed): Whole fruit unless qualified: e.g.

- Banana after removal of crown tissue and stalks.
- Pineapple after removal of crown.
- Avocado, mangos, and similar fruit with hard seeds: Whole commodity after removal of stone but residue calculated and expressed on whole fruit.

- Group 023 Oilseeds and oilfruits

Portion of the commodity to which the MRL applies (and which is analyzed):

- Oilseeds: Unless otherwise specified, seed or kernels, with shell or husk.
- Peanuts: Kernels
- Castor beans: Whole product after removal of capsules
- Cotton seeds: Undelinted
- Oilfruits: Whole commodity

Comparison of the guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG41-1933) with the classification of food and feed (CXA-4-1989)

The Philippines also agrees with the consensus that Classification of Food and Feed (CXA 4-1989) should take precedence over Guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993) and the recommendation for the revocation of CXG 41-1993.

REASON

It is important to incorporate the agreed revisions to update the Classification of Food and Feed (CX 4-1989) so that the changes on Group 006 assorted tropical and sub-tropical fruits – inedible peel and Group 023 oilseeds and oilfruits will be implemented.

Relevant to the revocation of CXG 41-1993, the Classification of Food and Feed (CXA 4-1989) is the single authoritative reference for the classification of food and feed for the establishment of maximum residue limits for pesticides and should take precedence over CXG 41-1993. Retaining only one guidance/reference document on the portion of commodity to which the MRLs apply, and which is analyzed will prevent any redundancy or discrepancy.

Agenda Item 8**CL/2023/36-PR****Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF working group on compounds for dual use – status of work**

POSITION

The Philippines supports Agenda Item 8 Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF working group on compounds for dual use – status of work. It was suggested that JECFA and JMPR should collaborate to harmonize the process of evaluating the criteria for dual-use compounds and to share data with prior consent from sponsors. This necessitates a high degree of confidence and trust among the parties involved. In cases where different Codex MRLs are recognized for similar edible commodities of animal origin, the EWG recommends selecting the higher MRL value.

The recommendations are agreeable as proposed by the Joint CCPR/CCRVDF EWG and revised by CCRVDF26 (2023). The Philippines has no other suggestions on the issues discussed in CX/PR 23/54/10. We also support the re-establishment of the Joint EWG to accomplish recommendation items 4 and 5.

REASON

Collaboration between JECFA and JMPR will result to a more meaningful data available. Further, the evaluation of dual-use compounds, as well as the resolution of commonly encountered issues or concerns will be more efficient.

Agenda Item 9**CL/2023/37-PR****Discussion paper on the management of unsupported compounds without public health concern scheduled for periodic review**

POSITION

The Philippines supports Agenda Item 9 Management of unsupported compounds without public health concerns scheduled for periodic review as presented in Section 1 of Appendix I of CX/PR 23/54/11. The draft discussion paper provides an overview of a potential method for identifying CXLs for unsupported substances that pose no risk to public health but are crucial to Codex's objective to safeguard consumer health while facilitating trade. In order to aid nations like ours in putting the aforesaid management strategy into practice, the Philippines is also amenable to the proposed partnership initiatives and activities with Codex, FAO/WHO, JMPR, governments, and industry. Particularly, offering capacity-building programs and workshops through JMPR to encourage the completion of relevant technical studies, determining Codex member/observer organizations who are interested in supporting specific compounds, and identifying the workload of those who will provide the missing data.

REASON

The necessary data to independently support the important applications or compounds for periodic re-evaluation is not yet available in the Philippines. Hence, the Sub-committee on Pesticide Residue (SCPR) is inclined to work effectively among its members, and with other government agencies, and/or research institutes to satisfy the requirements of the JMPR.

Agenda Item 12**CL/2023/38-PR****Discussion paper on guidance for monitoring the purity and stability of reference material of multi-class pesticides during prolonged storage**

POSITION

The Philippines supports the following recommendations of the EWG for CCPR54 to:

- (i) consider the proposal for new work on monitoring the stability of reference material purity of pesticides during prolonged storage based on the information provided in the discussion paper;
- (ii) review the outline of the proposed new work to provide general guidance for the further development of the document in the Electronic Working Group should there be an agreement to proceed with the new work; and if so,
- (iii) establish an EWG to prepare guidance on monitoring the stability of reference material purity of pesticides during prolonged storage based on the outlined proposal for consideration by CCPR55 (2024).

REASON

The development of a harmonized guidance document on monitoring the stability of reference material purity of pesticides during prolonged storage is beneficial and cost-effective to the country and concerned stakeholders.

Agenda Item 13**CL/2023/39-PR****Enhancement of the operational procedures of CCPR and JMPR: Opportunities, challenges, and recommendations on next step**

POSITION

The Philippines concurs with Agenda Item 13 about the 2-step approach recommended by the Electronic Working Group (EWG) to enhance CCPR and JMPR's operational procedures as well as any possibilities and challenges that may come about because of these changes. There are no further suggestions that we want to include in the proposed workplan.

REASON

Based on the summary of submitted information from Codex members and observer organizations, there was broad agreement that improving the operational processes of CCPR and JMPR was necessary to alleviate issues about JMPR's existing workload and the anticipated increase in demand for compound assessments. The Philippines trusts that the EWG's inputs will result in the creation of long-term strategic plans that will be advantageous to both JMPR and CCPR members.