

APPENDIX XIII

**ENHANCEMENT OF THE OPERATIONAL PROCEDURES OF CCPR AND JMPR:
Opportunities, Challenges, and Recommendations on Next Steps**

I. OVERVIEW

1. The 53rd Session of the Codex Committee on Pesticide Residues (CCPR53, 2022) established an Electronic Working Group (EWG) to collect information on the need to enhance the operational procedures of CCPR and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) and the associated opportunities and challenges.¹ The EWG's terms of reference were to:
 - i. *Prepare a circular letter (CL) to request information from members and observers on the need to enhance CCPR/JMPR and the associated opportunities and challenges. In addition, the CL may invite members and observers to consider a second or possibly subsequent workshops that would expand on and further develop some of the themes addressed in the virtual workshop sponsored by CropLife International on March 31, 2022, as described in CX/PR 22/53/20.*
 - ii. *On the basis of the responses to the CL, prepare a summary of the submitted information and a discussion paper that summarizes findings for consideration at CCPR54 and later transmission to JMPR.*
 - iii. *Coordinate work with related EWGs such as the EWGs on priority lists, national registration database, unsupported compounds.*
2. Based on these terms of reference, the EWG prepared CL 2022/75-PR to request comment from Codex Members and observer organizations.² Comments submitted in response to this CL have been compiled in this discussion paper and are intended to guide CCPR and JMPR on future deliberations on how to improve the existing Codex system to meet current and future demand for JMPR evaluations. This discussion paper first provides background on EWG, then summarizes submitted comments, and finally makes recommendations for considerations by the 54th Session of CCPR. A compilation of all submitted comments is also provided in *Appendix I* of this discussion paper.

II. BACKGROUND

3. At CCPR53 (2022), concerns were raised that the current CCPR/JMPR system is unable to keep up with global demand for the evaluation of new compounds, uses, and periodic reviews. While the most recent deliberation at CCPR53 was prompted by the cancellation of JMPR meetings following the Covid 19 pandemic, the growing demands on JMPR and its implications have been an important topic of discussion at several previous sessions of CCPR.³
4. Most notably, FAO/WHO commissioned a 2002 review of the working procedures of JMPR⁴ that was reviewed at CCPR34 and the JMPR 2002 Regular Meeting. Key findings from the 2002 FAO/WHO report are summarized below and remain relevant today:

"Whereas in the 1960s the JMPR monographs, which summarise the scientific data following a critical evaluation, were extremely brief in accordance with the standards of the time, the modern monographs are very detailed and extend to over one thousand pages for a particular Meeting."

"There has been a huge increase in the quantity of scientific data submitted for evaluation, and yet the JMPR only exists for two weeks of the year, in contrast to the situation at a national regulatory authority level."

"Financial resources available for this work have not increased proportionally leading to the generation of a backlog of pesticides waiting for review."

¹ 2022, Report of the 53rd Session of CCPR, Paragraphs 253-259 (REP22/PR53, 253-259). Available at:

https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-718-53%252FREPORT%252FFINAL%252520REPORT%252FREP22_PR53e.pdf.

² https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FCircular%252520Letters%252FCL%2525202022-75%2528Rev1%2529%252Fcl22_75e.pdf

³ REP22/PR53, paras. 253-259

⁴ 2002, Report on the Review of the Working Procedures of JMPR. Available at:

https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf.

"The current JMPR system is also very vulnerable in that it relies on the goodwill of a limited number of individuals who work on a voluntary basis. These individuals, despite being internationally recognised in their fields, have to prepare the monographs without any financial reward and usually in their own personal time."

"Typically, the Temporary Advisers of the WHO Core Assessment Group and Members of the FAO Panel have to spend the equivalent of 2-4 months full-time prior to the meeting preparing the monographs. The availability of suitable experts that are prepared to work on this basis is very limited."

5. In its review of the 2002 FAO/WHO report, CCPR34 confirmed that "JMPR was essential to the continued independent international evaluation of pesticide residues" but raised similar concerns that the increased demands on JMPR has resulted in a process that "had become unsustainable and without additional resources the system would fail sooner, rather than later."⁵ JMPR re-iterated these concerns at its 2002 regular meeting, but also cautioned that making changes to the operational procedures of JMPR "requires considerable resources and the implementation could become counter-productive if it is no more than the introduction of one suggested change after another without an overall strategic direction."⁶ JMPR-2002 then concluded by recommending that FAO, WHO, and the Codex Alimentarius Commission prepare a strategic plan that can serve as a framework for future changes.
6. There have been continued discussions on the increased demands on JMPR since FAO/WHO's 2002 report was published, but a strategic plan was never developed to guide future changes to JMPR. Therefore, CCPR is now revisiting whether there is a need to enhance the operational procedures of CCPR and JMPR and what associated opportunities and challenges may arise from these changes. This information will be used by CCPR and JMPR to further explore how to improve the existing system to meet current and future demand for JMPR evaluations.

III. SUMMARY OF COMMENTS

7. This section provides a summary of the responses to CL 2022/75-PR and is organized based on five CL charge questions that requested information on:
 1. The need to enhance the operational procedures of CCPR/JMPR,
 2. Opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes,
 3. Anticipated challenges in implementing proposed enhancements and major reform;
 4. Recommendations on key topics and themes for potential stakeholder workshop; and
 5. Any addition proposals and recommendations that are relevant to CCPR's discussion of enhancements to CCPR/JMPR.
8. A total of fifteen Member Countries and three Observer Organizations submitted information in response to CL 2022/75-PR. The summary of responses highlights both areas of consensus and divergent opinions on enhancements to the operational procedures of CCPR/JMPR. The summary of responses also provides specific recommendations on opportunities and associated challenges and is organized into common themes. A complete compilation of comments is also provided in *Appendix I* of this discussion paper.

Charge Question 1:

Please comment on the need to enhance the operational procedures of CCPR/JMPR to (i) eliminate the backlog of compounds evaluations caused by the cancelation of JMPR meetings due to the COVID19 pandemic and (ii) expand its review capacity to meet the future demand. If possible, please organize your response using the suggested categories below.

- Current workload of new compounds, uses, and periodic evaluations

⁵ 2002, Report of the 34th Session of CCPR, Review of the Working Procedures of JMPR, Paragraphs 181-200. Available at: https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?Ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252F718-34%252FAI03_24e.pdf.

⁶ 2002, JMPR Report, General Considerations, Section 2.1: Needs of JMPR. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/Reports_1991-2006/Report_2002.pdf.

- *Future workload demand for new compounds, uses, and periodic evaluations*
- *Other reasons to enhance the operational procedures of CCPR/JMPR*

9. There was general consensus that there is a need to enhance the operational procedures of CCPR and JMPR to address concerns related to both JMPR current workload and future demand for compounds evaluations. Commenters emphasized that JMPR is essential for the independent international evaluation of pesticide residues but raised concerns about the growing workload due to disruptions from the Covid 19 pandemic, increasing complexity of assessments, and growing number of existing compounds that qualify for periodic review. It was also highlighted that the growing workload and complexity of evaluations was identified as an issue by JMPR in 2002 and the “voluntary contributions by individuals of their own time, is not sustainable with the increasing workloads and the complexity of modern evaluations.” This commenter further noted that the complexity of evaluations and JMPR’s workload has only increased since this 2002 JMPR report. Several other commenters also indicated that capacity issues have been discussed by CCPR for more than two decades and that many improvements identified in 2002 JMPR Report remain unresolved.⁷
10. Several commenters cautioned that increasing JMPR’s capacity will require more than recruiting additional experts because JMPR must evaluate a range of complex issues, make scientifically sound judgments, and has limited time during its annual meetings. As an example, one commenter highlighted that a typical JMPR meeting consists of 12 - 15 full compound assessments and 15 - 20 new uses assessments, resulting in less than one day per compounds on all scientific issues. As such, the commenter suggested that it may be challenging to increase the output of JMPR without changing the rigor and independence of its evaluations. Other commenters raised similar concerns and suggested that while it may be possible to increase the number of experts, it may not be feasible to extend JMPR’s regular meetings beyond its current period (i.e., 9 working days) to review additional compounds. For example, concerns were raised that efforts to increase JMPR’s review capacity will also require increased, sustainable funding from various national authorities. It may be challenging for national authorities to commit to providing increased financial support to JMPR/CCPR in light of all other national priorities.
11. Beyond the broader questions of whether there is a need to enhance the operational procedures of CCPR/JMPR, there were range of suggestions related to the management of JMPR’s workload and more clearly defining the time and resource requirements to conduct evaluations based on the experience of JMPR’s experts. Specific suggestions included:
 - Request that the FAO/WHO Secretariats conduct a survey (e.g., by requesting JMPR experts’ experience) on:
 - the usual time required during meetings for the evaluation of a new compound and for evaluation of a substance under the periodic review program (assuming all relevant preparations have been completed before the meeting, such as preparing close to final, internally peer-reviewed evaluations and appraisal documents),
 - the usual time required during meetings for new MRL assessments and
 - the usual time required during meetings for general issues like responses to CCPR or General Items.

Based on this information, the workload and prioritization of the meeting agenda could be aligned with the available timeframe and required additional resources could be quantified and appropriate measures taken on that basis.

- CCPR/JMPR may want to focus on more clearly communicating the impact of the cancellation of physical meetings on the schedule of reviews for JMPR and develop a public workplan that provides a status update on reviews that have been initiated by JMPR, whether they will be delayed, and indication of a target completion year by JMPR. Similarly, another commenter suggested that JMPR develop an electronic platform/portal that provides summary information on its workload and a database of experts that cover all areas of the JMPR work.
- A more stringent approach should be adopted for existing compounds with CXLs that are no longer supported by a manufacturer. The 4-year rule already exists for unsupported substances and the 25-year rule is laid down in the Codex procedural manual, but it is not implemented in CCPR in a strict way. Notably, the procedural manual clearly states that “the proposed MRL is maintained for a period of no more than four years” and that when “there is no commitment to provide additional information, or no data are supplied despite a commitment being made in relation to the four-year-rule, the CCPR considers withdrawal of the draft MRL.” A clear decision should be taken by CCPR to withdraw such substances. Consequent withdrawal of the

⁷ 2002, Report on the Review of the Working Procedures of JMPR. Available at: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf.

corresponding CXLs will contribute to reducing the number of substances for which a periodic review is overdue.

- The number of active substances with the reference “Awaiting advice on supported commodities” increases from year to year. As such, data submitters need to meet their commitments in a timely and comprehensive manner. Here too, a more stringent use of the rules laid down in the Procedural Manual would be necessary.

Charge Question 2 and 3

Please comment on opportunities to enhance the operational procedures of CCPR/JMPR to improve the efficiency of the evaluation process and increase JMPR’s evaluation capacity. Please consider both opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes) in your comments. If possible, please organize your response using the suggested categories below.

- Opportunities for Enhancement
 - Data Sponsor Dossier and Electronic Data Submission
 - CCPR Processes and Procedures
 - JMPR Evaluation Process and Procedures
 - JMPR Organizational Structure, Staffing and Resources
 - Other Areas of Enhancement
- Opportunities for Major Reform
 - Use of National Reviews and Data
 - Alternative Peer Review Models
 - Other Areas of Reform

For the opportunities you have identified, please comment on the anticipated challenges and propose possible solutions that may be implemented by CCPR and JMPR. This may include challenges related to resources, process and procedures, and governance.

12. Responses to Charge Questions 2 and 3 are excerpted in *Table 1* and *Table 2* below which provide information on opportunities for enhancement (e.g., improvements to existing processes) and major reform (e.g., governance and structural changes), respectively. The summary information presented in the tables was excerpted directly from submitted comments and organized based on common themes.

Table 1: Summary of Comments on Opportunities for Enhancement to CCPR/JMPR and Associated Challenges.

Theme	Excerpted Comments on Challenges and Opportunities
Data Sponsor Dossier and Electronic Data Submission	
<i>Data Standardization, Digital Templates, and Information Technology (IT)</i>	– JMPR has developed extensive guidance documents on the preparation of dossiers and supporting data for evaluation by the FAO and WHO panels of JMPR. While the guidance documents outline requirements related to data formatting and organization of pesticide residue and toxicological information, there may be further opportunity to standardize the submission of data files that are submitted to JMPR for evaluation. For example, are there data submission software tools and data reporting standards that can be used to harmonize data across different sponsors? Harmonization of data submission across sponsors could potentially improve the efficiency of the evaluation process because JMPR reviewers could evaluate supporting data in a single format when performing analysis and summarizing relevant information. – A potential area of interest that could be explored further is whether a standardized submission format could be developed for field residue trial data. Other areas of interest could be identified by JMPR and discussed with sponsors to determine the feasibility of developing tools to further standardize the reporting and submission of data. – Data sponsors have made progress to provide quality dossiers. Data sponsors seek yearly feedback on how they can further improve the dossiers to facilitate the work for the experts

Theme	Excerpted Comments on Challenges and Opportunities
	at JMPR. Periodic workshops to develop and implement improved digital templates and tools will be welcomed going forward. – Furthermore, IT tools need to be modernized to accept full dossiers as electronic submissions and study data in structured form. For example, FAO requested in its manual for the submission of residue data from 2016 the submission of residue data on spreadsheets. – Several templates have been developed and presented by Sponsors, but to date there is no agreed solution. As a major step forward FAO/WHO should establish relational databases with interfaces for upload of (structured) information provided by sponsors; utilizing electronic submissions by adopting OECD recommended formatting and naming conventions for study reports would also add efficiencies to the process. – As a first step it is suggested to explore and map all the possible non costly ways to enhance the operational procedures like improving templates and forms to enable expedited reviews and evaluation reports. The feedback could be also collected from the JMPR experts and industry to see which parts can be improved. It is also important for industry to be more proactive and send complete data packages in order to ensure that assessments are carried out without delay. For periodic reviews, the industry already knows the schedule many years in advance and can commit themselves to prepare the data packages well in advance. – There is need to develop a quality criterion to be used by the Data Sponsor Dossier and Electronic Data Submission to enhance credibility and verifiability of the JMPR global monographs. In addition, the sponsors should provide sufficient and current data within a specified time frame for efficient evaluation of pesticides to completion. – There is an opportunity to use electronic database as a tool for evaluation or screening process. For example, data sponsor dossier and electronic data submission, the national registration database to consider the re-evaluation of pesticides, particularly those unsupported compounds without public health concern, can be digitalized. – Data submitters should ensure to submit the same data as that submitted to all national authorities. – Data submitters are strongly encouraged to use a similar format to that which is in the JMPR Evaluations to generate the dossiers, especially the residue tables, as experts spend a considerable amount of time reformatting the dossier to meet the JMPR formatting requirements.
<i>Timely Data Submission</i>	– It is considered that if data submissions could be made available to JMPR reviewers in a timely and consistent format which reduces the need for data entry, clearly identifies all food and feed metabolites and addresses all data requirements, then this should increase JMPR's efficiency. Ensuring that data submissions clearly address identified issues, and the avoidance of submissions which do not provide for the updating of relevant end points would assist in focusing work and avoid committing evaluator time without a concrete outcome from the JMPR process. The submission of incomplete data packages for new compounds and periodic re-evaluations can result in a significant waste of time and resources. Contemporary templates or electronic formats which ensure the onus on the sponsor to provide "user friendly" dossiers could provide substantial productivity improvements. Additional training through workshops on JMPR requirements for data packages could also be helpful.
<i>Current Data Submission Issues</i>	– When crop field trial data do not reflect the critical GAP, FAO experts spend a considerable amount of time trying to be flexible, attempting to "fit" the data to the critical GAP. – In recent years, metabolites were not consistently named in the WHO and FAO dossiers, making it very difficult to cross-link the metabolites, and ensure the appropriate and correct ones are considered in the residue definition. – Additional scientific and robust data on the toxicology of major plant and animal metabolites would assist in refining the residue definitions for risk assessment and limit the frequency of

Theme	Excerpted Comments on Challenges and Opportunities
	conducting metabolite-specific risk assessments based on Cramer Classes, which are very time consuming.
CCPR Processes and Procedures	
<i>Development of Efficient Dossiers</i>	– There are opportunities for improvement particularly for the resource intensive and data rich dossiers for periodic reviews of Codex MRLs. As a matter of fact, the number of substances that are scheduled for periodic reviews is building up. Since the resources of JMPR are limited, the list of periodic review substances are leading to a growing list of 'reserve compounds' for new substances. That is an unsatisfactory development from a sponsor's point of view. Sponsors need to prioritize the preparation of dossiers which were postponed. For the next JMPR, the dossier for a rescheduled periodic review needs to be updated with new information that has become available, to avoid inconsistencies between data submitted to JMPR and national authorities. Where new data become available, a clear procedure for submission is needed from CCPR to add these data, due to the fact that they no longer show-up on the schedule.
<i>Schedule and Priority List</i>	– To reduce the number of new uses for the same compound being reviewed at different JMPR Meetings, sponsors should consider maximizing the number of uses requested within one petition.
<i>Coordination on Risk Management Issues</i>	– JMPR should clearly describe the principles followed in its scientific risk assessments and ensure that issues that relate to risk assessment policy are referred to the CCPR. The CCPR reports shall explicitly state such policies in sufficient detail to ensure that the national governments and JMPR can apply them in their evaluations. This shall promote effective communication on risk assessment processes and procedures between CCPR and JMPR.
<i>Criteria for Periodic Reviews</i>	– An approach to enhance CCPR process is to extend the duration of periodic review specified in the Codex Procedural Manual, especially for the non-toxic pesticide of which the national registration exists. If GAPs for pesticide uses remain unchanged, CXLs are able to be retained. – Determine if it is possible to extend out the period for period evaluations such as 20 years. This will reduce the number of periodic evaluations over time
<i>CCPR Plenary Discussion on MRLs and Appropriate Scope of Interventions</i>	– The CCPR processes and procedures are relatively efficient, especially considering the scheduling of pre-meetings for various eWGs, ahead of the plenary, where several concerns raised by member countries are resolved, allowing a more focused discussion during the plenary. – In recent years, the MRL discussions have taken up significantly less time during plenary. However, the delays in reaching a consensus on some compounds appear to be due to the interventions from non-members (observer status) raising concerns that are not always scientifically-based and validated. While the CCPR Chair and secretariat have been very respectful and diplomatic in addressing these interventions, CCPR is encouraged to explore opportunities to limit such interventions from observers, used predominantly to show case their organization.
<i>Timely Maintenance of the Codex Pesticide MRL Database</i>	– Extra resources could be put towards updating the pesticide MRL database in a timely manner following adoption by Codex. Countries rely on this database as the source of truth for CXLs, so maintaining its currency should facilitate trade. – In addition, the Codex secretariat is asked to update the online CODEX MRL database shortly after the CAC meeting, ideally within 90 days, to reflect the most recent decisions and allow for practical search for CXLs by food value chain partners and competent authorities.
<i>CCPR Support for Extra Meetings</i>	– CCPR is responsible for establishing the schedule and priority list for JMPR and has more limited ability to improve the efficiency of the evaluation process and increase JMPR's evaluation capacity. In the past, CCPR has also helped support extraordinary meetings of JMPR and 2019 and 2021. Extraordinary meetings can help increase the review capacity of JMPR in short-term instances; however, increasing the frequency of meetings also places

Theme	Excerpted Comments on Challenges and Opportunities
	additional burden on JMPR evaluators and will not increase JMPR's overall capacity if there is not an increase in the number of trained JMPR experts who are available to participate.
JMPR Evaluation Process and Procedures	
<i>Required Scope and Level of Detail in Data Sponsor Dossiers and JMPR Monographs</i>	– Does JMPR undertake a pre-assessment of the Data Sponsor Dossier before assessment is undertaken. If not, then this could be an opportunity to filter out incomplete dossiers before they enter the assessment process. They then go to the back of the queue. Depending on the process, there could be backup submissions to replace those submissions rejected at the pre-assessment. – Where additional uses are made for existing compounds, when the compound is due for a periodic evaluations, what is JMPR position on assessment of such data eg less than 5 years from when the periodic evaluation commences. – JMPR monographs need to be transparent and sufficient for a third party to determine how JMPR reached its conclusions and recommendations. The key challenge is how much is too much and how little is too little. – Therefore, is the balance between these two correct for current monographs? Should it be considered they are 'over engineered' then they could be reduced saving time for assessors and allowing them to assess more submissions.
<i>Working Procedures</i>	– The main bottle neck are the capacity and limited number of experts rather than the processes and procedures within JMPR. JMPR should consider the following concrete proposals: - JMPR should continue to work face-to-face complemented by virtual meetings. - Provide the opportunity for pre-submission meetings between the data sponsors and the expert evaluators. - There should be an opportunity for the data sponsor to respond to concerns during the JMPR. This could reduce the number of MRLs that cannot be set because of "missing" data, or misalignment between tox and environment evaluations. – Regarding scientific procedures, where data requirements change, following discussions in JMPR or other expert consultations, FAO/WHO are asked to better explain the rationale for this change and invite public comments before implementation. Changes in requirements should be published on-line as amendments to existing guidance, and not requested on an ad hoc basis during evaluations. FAO and WHO should increase their efforts to ensure that all decisions are taken consistently in line with published guidance. – Revision of evaluations after the JMPR leads almost unavoidably to a one year delay in progressing a standard. FAO and WHO are asked to implement procedural changes so that, where necessary, JMPR opinions can be revised prior to the next CCPR meeting. In case of concerns, a peer review by different experts as a second opinion is suggested. – For new compounds, periodic reviews, and new uses where new toxicology data is submitted to WHO, consideration should be given to having WHO complete their evaluation one year prior to FAO conducting their evaluation. Having the Health Based Guidance Values (HBGVs) and toxicology assessment of the metabolites well ahead of the FAO evaluation could reduce the amount of time spent during the Meeting conducting the risk assessment. Currently, FAO receives the WHO assessment on the metabolites days before the end of the Meeting, creating significant but unnecessary stress and anxiety.
<i>Quality Control Check in Data</i>	– Quality assurance criteria is set for the data submitted to JMPR for review and evaluation and FAO and WHO explore the practical considerations associated with undertaking some of the work of the JMPR on an inter-sessional basis.

Theme	Excerpted Comments on Challenges and Opportunities
<i>Submission</i>	– Rationale: This will enhance the credibility of the data and the monographs while the inter-sessional meetings are likely to reduce the workload. – Typically when a complete data package is submitted and no issues are identified, the JMPR manages to complete assessments of compounds within a 12 month timeframe. Data packages are usually submitted in the 4th quarter of the year prior to the JMPR Meeting. These data packages are assessed and recommendations made and published in the month following, usually in October. That is significantly faster than many national authorities. – Ensuring that the JMPR evaluator has a complete dataset, by a set cut off date, may help facilitate a more efficient JMPR evaluation. An effective mechanism for JMPR conducting preliminary checks of submission quality may be beneficial. – The current approach is for the JMPR toxicology and residue evaluations to be conducted at the same time, but the completion of a draft toxicology monographs the year before the residue's evaluation is undertaken may allow for more efficiencies for the residues evaluation particularly with regard to the residue definition determination and dietary exposure assessments. This however may require clear identification of potential food and feed metabolites to the JMPR toxicology evaluator by the sponsor and a potential need for the toxicology monograph to be revisited when the residues monograph has been drafted.
<i>Efficiency in Virtual Collaboration</i>	– <i>Virtual meetings:</i> Although virtual meetings cannot replace in-person meetings, they could be a mechanism for potentially increasing the number of approvals for smaller and less complex evaluations (e.g. new uses). Virtual meetings cost less to host than in-person meetings and generally require less planning (i.e. no need to book hotels and flights). However, the challenge with virtual meetings is the differing time zones. recent years, FAO has held a few virtual pre-meetings leading up to the September meeting, with members grouped according to time zones, to go through as many identified issues before the Meeting. However, as these pre-meetings do not involve all FAO experts, consensus can only be reached during the Meeting, where occasionally differing scientific opinions are raised and experts are required to revisit/re-assess decisions previously reached in the pre-meetings. – <i>JMPR Sharepoint:</i> FAO created a sharepoint to share information, provide updates, exchange reviews, which has been extremely useful. FAO experts have the opportunity to peer-review the reviews on the sharepoint, ahead of the Meeting, which would facilitate and expedite discussions during the Meeting. However, most FAO experts are so busy with their day-to-day jobs, reviewing/completing their own compounds (on their own time), there is very little time for the entire panel to peer-review the reviews available on the sharepoint ahead of the September meeting. – The effective use of virtual meetings and more extensive peer review should be continued with the aim of resolving possible issues in advance of the face-to-face meeting. – The virtual meetings held during the pandemic shutdowns highlighted the importance of face-to-face meetings to enable full engagement in discussions of complex issues over a number of days. Particularly given the variety of time zones involved. As a result, for anything other than relatively simple decisions, face-to-face meetings are essential.
JMPR Organizational Structure, Staffing and Resources	
<i>Funding</i>	– Funding is one of the key constraints. If JMPR could employ more staff and pay assessors this would assist. – The previous 2002 review of the working procedures of JMPR: https://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/crit_review.pdf. This report found that “both the FAO and WHO are severely limited in the financial resources that they can make available for the work of the JMPR due to competing demands on their respective budgets.”

Theme	Excerpted Comments on Challenges and Opportunities
	– Position: Developing countries have financial limitations and therefore recommends that FAO and WHO explore the possibility of securing additional funds from donors e.g., Crop Life International to allow the better resourcing of the JMPR. – Rationale: Additional funding shall improve efficiency and increase output. – While increasing the capacity of JMPR may address the workload demand, to do so requires increased sustainable funding from various national authorities. However, in the current financial climate, it is questionable whether national authorities will agree to commit funds to support JMPR/CCPR in light of all other national priorities.
<i>JMPR Experts</i>	– Since the shortage of JMPR experts to carry out the evaluation of toxicological and residues dossiers submitted by the agrochemical industry and member countries has been identified as a key contributing factor behind the built-up of the backlog. It is also suggested that CCPR and JMPR shall jointly explore the possibilities and approaches for enrolling more JMPR expert from Member Countries. Equally important is to recruit and train up promising young officers with good scientific qualification and technical experience in the critical domain areas through capacity building and mentorship programme. – One option could be the implementation of additional meetings of the JMPR. However, it seems very unlikely that experts already working for JMPR pro bono will be available for more than one meeting. Instead, a second group of experts and an overarching structure would be needed to keep the two expert groups connected and harmonize procedures and evaluations (otherwise, a lack of consistency is likely to occur). – Despite the FAO training and recruiting workshops held most recently in 2017 (Ottawa) and 2020 (Chile), these sessions only identified a handful of successful candidates, some of which have joined the JMPR, while others declined due to competing priorities and career opportunities. These last few years, several knowledgeable and experienced experts have retired. While the overall number of FAO experts may not have fluctuated considerably over the last few years, the workload has increased exponentially. As a result, each expert is assigned one new compound or periodic review with up to 3 new uses, which is not sustainable, especially considering that most experts conduct their reviews outside of work hours, on their own time and on a voluntary basis. – Recruiting more JMPR experts is very difficult and resource-intensive. Regulatory authorities are not always able to send more than 1-2 experts to JMPR or allocate time during their work hours to conduct JMPR review due to priorities of the national authority. In addition, experts are volunteers and are not compensated for the amount of time spent working on the evaluations. In addition, although the in-person meetings give experts the opportunity to travel, there is very little recreational time for them to enjoy the cities. FAO experts only get one day off (over an almost 3 week meeting) and work late hours. There is a lack of incentive to become an expert. – The 2002 JMPR report found that participation of JMPR experts is done on a voluntary basis and requires the support of national regulatory authorities. National authorities may be resistant to allowing their experts to work on JMPR. Given these constraints in resources and staffing, it may be more promising to consider other opportunities that increase the efficiency of the existing evaluation process or re-evaluate the JMPR evaluation model. – It is considered that recruiting and training new expertise and retaining existing JMPR expertise is of critical importance. JMPR training sessions for potential new toxicology and residues evaluators may help recruit new experts but additional initiatives to attract and retain experts may be needed. Retaining existing expertise to help train new additions and to complete the more complex evaluations in the short-term is of great importance but care should be taken to not over-burden experienced experts. JMPR experts can spend considerable amounts of their own time preparing JMPR monographs and it has been suggested that a cap on the number of hours JMPR experts can individually spend on monograph preparations prior to the meeting may help attract and retain experts.

Theme	Excerpted Comments on Challenges and Opportunities
	– Another option for increasing the JMPR expert capacity that should be explored is for the FAO and WHO to employ full-time JMPR evaluators, or second staff on a semi-permanent basis, to draft a certain number of monographs per year. This would assist with providing monographs to the meeting, however it should be noted that there still may be challenges within the current format for enough ‘face-to-face’ time for discussion of issues. A clear process for peer review for these reports would be required, which may still rely on the resources of the JMPR experts. – JMPR meetings are typically held in Rome or Geneva, but more flexibility in terms of meeting locations may be attractive to JMPR experts, particularly for those based outside of Europe.
	– More experts are needed to expand the capacity of the JMPR panels.
<i>Staffing</i>	– FAO/WHO joint secretariats need additional staff, but not in a position to quantify that demand. – For matters requiring a high degree of specialization, FAO and WHO are asked to add experts to their panels representing multiple geographical regions, including from underrepresented ones.

Table 2: Summary of Comments on Opportunities for Major Reform to CCPR/JMPR and Associated Challenges.

Theme	Comments on Challenges and Opportunities
Use of National Reviews and Data	
<i>Use and Evaluation of National Reviews by JMPR</i>	– In principle this is something that should be explored. It assumes there are national reviews completed when JMPR assesses the compound. Another consideration does there need to be criteria on what is considered an acceptable national review.
	– Recommends the use of National and/or Regional Scientific Data for Risk Assessment by JMPR. The use of these national or regional summaries of data by the JMPR would result in substantial time savings, while allowing the JMPR to concentrate on international risk assessment.
	– We are of the view that there is an opportunity to use the national reviews for JMPR’s evaluation. However, the capacity building is also needed to strengthen capabilities of Codex members to fulfil the requirements for JMPR evaluations. Furthermore, the details of each stage of the national review procedure should be thoroughly provided.
	– JMPR experts should consider national reviews in their evaluations. The submission of national reviews to initiate JMPR reviews has been requested by FAO for a long time. These national reviews could be submitted by national authorities in response to the Circular Letters, where all stakeholders are invited to submit relevant information. Therefore, especially the owners/publishers of those reviews should be encouraged to submit this information. Codex could also develop a system of all new national MRL reviews. For periodic reviews of existing MRLs, Codex could refer to private global databases (e.g. Homologa) that can be leveraged as they have tracked global MRL and labels for more than two decades.
	– Given that it may be difficult to change the availability of JMPR resources and staffing, one potential area of opportunity is the use of national-level reviews by JMPR. The relates to current work by CCPR to enable the participation of JMPR in the global joint review of new compounds. The use of national reviews of data was considered in the 2002 review of the working procedures of JMPR and may be helpful to re-evaluate based on advancements by the Organization for Economic Cooperation and Development and regional approaches that may be able to be further leveraged by JMPR.
	– It is unclear what is being proposed by use of national reviews and data. The data packages provided to the JMPR often represent data from several countries. Following review of the data and the regulatory approvals in place at the time of the JMPR assessment, the critical

Theme	Comments on Challenges and Opportunities
	GAP is decided upon the supporting data used to make a maximum residue limit recommendation. – If the proposal is for JMPR to use national reviews of data and the related risk assessment, it is considered that there are pros and cons associated with the potential use of national reviews. There may be efficiencies in terms of monograph preparation if a national review could be used by the JMPR evaluator, for example to produce tables of residue trial results. The Australian Pesticides and Veterinary medicines Authority has an established process for considering international assessments to inform its regulatory decision, but it does not simply adopt the conclusions of that international assessment. If national reviews were to be used by the JMPR, a process will need to be determined to maintain the independence (both perceived and actual) of the JMPR and ensure that the decisions made by the JMPR are consistent with the JMPRs risk assessment framework. The concept of JMPR joint reviews with a national regulator has been discussed recently, but to date lacks any real drive.
	– JMPR consists of experts from many different regulatory agencies and already takes note of National Review documents and data to support their conclusions. A decision on using National Reviews directly for establishing CXLs would be up to the risk managers. They also would have to define the circumstances under which such an approach would be acceptable for Codex Members.
	– National Reviews often differ from one authority to another due to different science policies and legislative requirements and in many cases because manufacturers often submit different data to each authority. All national reviews have their merits, therefore, it is questionable how JMPR will determine which national review it will rely on. Furthermore, the format and templates used to review toxicology and residue chemistry data are different among the various authorities. If all authorities and JMPR can agree to one standard template/format, perhaps the individual national reviews (excluding decisions) or summaries of each scientific study can be relied upon by JMPR, precluding JMPR experts from recreating tables and entering data.
	– Use of national reviews and data by JMPR must be balanced with the need to maintain JMPR as an independent, international scientific advisory panel. This is a core element of JMPR so clear working procedures would have to be developed to maintain its ability to independently evaluate pesticides when making MRL recommendations.
	– It is considered that the use of national monographs may pose certain challenges with the perception of independence of the evaluation process, as well as requiring permission to be obtained not only from the sponsor but from the national authority for the use of the document.
Alternative Peer Review Models	
<i>Scope of Current Approach and Whether Alternatives are consistent with the Codex Risk Analysis Principles</i>	– Is the current Peer Review model fit for purpose? Is it too extensive or light, or just right. It is not clear what criteria are used for peer review process or the number of persons involved in the peer review process. These could be reviewed as to whether they are still fit for purpose.
	– Alternative peer review models would certainly alleviate the JMPR workload, however, any organization/authority designated as peer-review would need a sound knowledge of residue chemistry data, the Codex Risk Analysis Principles, the JMPR science policies (FAO Manual) and historical JMPR decisions to ensure consistency and accountability.
<i>Engagement on National Reviews</i>	– In order to facilitate the use of national reviews, we encourage the involvement of JMPR experts as observers. Procedurally, JMPR gets involved after a pesticide has been authorized in at least one Codex member state, as a condition for scheduling. For substances that have been nominated, by change of procedures, JMPR experts could be

Theme	Comments on Challenges and Opportunities
	invited as observers to meetings of authorities when decisions are taken on relevant topics, such as the definition of the residue(s), health-based guidance values, and MRLs. This could help to minimize differences between JMPR and national evaluations and to identify data gaps which could be closed prior to information submission to the JMPR. The independency of JMPR Reviewers' conclusions is ensured by the specific JMPR criteria they apply to a dataset summarized by a national review agency.
Other Areas of Reform	
<i>Scope of Evaluations and Default MRLs</i>	– Should the scope of commodities that can have a MRL established be revisited (for example animal feed commodities). If this is reduced then this would reduce the number of submissions and hence the workload for JMPR assessors. – Where a Codex MRL has been established for a new compound, could a default MRL (such as 0.01mg/kg) be also established if there is no dietary exposure concerns. This would assist by both reducing trade irritants and potentially reducing the number of MRL submissions.
<i>Developing a Continuous JMPR Review Program</i>	– Concerns were raised about whether annual decision making in Codex still meets current demands of Codex members. It was suggested that establishing a permanently existing JMPR working on scheduled submissions as a more appropriate solution to provide scientific advice. In addition, as already mentioned above, providing early advice to the CCPR on the schedule of existing chemistry for periodic re-evaluation could be an important contribution to reduce workload in JMPR and CCPR. – In order to move to a continuously working Codex system, a second virtual CCPR meeting could be established in addition to the annual meeting of CCPR. This additional virtual CCPR could exclusively decide CXLs while the face-to-face CCPR meeting manages CXLs and all other CCPR matters (e.g. eWGs). In order to leverage the efficiencies gained at CCPR, the CAC should adopt the proposed CXLs through a written procedure in addition to adopting CXLs at the face-to-face CAC meeting.

Question 4:

Codex members and observers are requested to provide feedback on the focus of additional stakeholder workshops that aim to expand upon the virtual stakeholder workshop sponsored by CropLife International on March 31, 2022 and summarized in [CX/PR 22/53/20](#). Please provide recommendations on key topics and themes for this follow-up workshop.

13. Following the publication of CL 2022/75-PR, CropLife International Organized two virtual stakeholder workshops on February 23rd and March 7th, 2023. Information on the virtual workshops was provided to EWG participant using the Codex Electronic Forum.⁸ Information and stakeholder input from these workshops is not summarized in this discussion paper but may be of interest to both CCPR and JMPR in future deliberation.
14. More limited comments to this charge questions were provided by EWG participants. Specific comments focused on additional are summarized below:
 - Future deliberation could benefit by discussing the previous 2002 review of the working procedures of JMPR. In particular, it would be helpful to identify key findings and recommendations that are relevant to current discussion on JMPR's review capacity. It would also be helpful for the follow-up workshop to include participation from a range of stakeholders in the evaluation process, including Codex Members, Observer Organizations, JMPR experts, and FAO/WHO. This will enable engagement of stakeholders and also ensure the viewpoints of JMPR experts that have the greatest understanding of the current process are represented.
 - In order to enhance the capacity of JMPR, some major procedural and structural changes will be necessary and should be seriously considered. While little improvements can be made immediately this will not address the structural problems arising from the fact that the JMPR is not a permanent structure supported by permanent staff. If a future workshop is organized, it should primarily focus on how to achieve major structural changes for the future (e.g., by developing a roadmap for such a change).

⁸ <https://forum.codex-alimentarius.net/viewtopic.php?t=1988>

- Three areas were proposed for future workshops, along with examples:
 - Communication (e.g., ways of working, exchange with data sponsors, IT Infrastructure)
 - Provision of Scientific Advice (e.g., overcome capacity constraints, more meetings, permanent 'JMPR', Practicability of inviting JMPR experts to expert meetings of governments.
 - CCPR (CAC) (e.g., procedural changes in CCPR, bi-annual meetings including one in-person and one virtual, written procedures, procedural changes in CAC)
- Finally, it was noted that other Codex Committees may experience similar challenges. Perhaps there is merit in engaging other Codex Committees to share experiences, exchange ideas and collectively brainstorm on how to make the process more efficient across Codex.

Questions 5:

Do you have any further proposals or recommendation that are not covered by the four previous questions?

15. There were more limited comments on additional proposal and recommendations that were not covered by the previous charge questions listed in CL 2022/75-PR.
16. Specific comments that are not addressed earlier in this discussion paper are as follows:
 - One commenter made the following proposals for consideration on budgetary issues:
 - Like FAO, WHO is asked to assign a permanent budget for the provision of scientific advice. While this matter cannot be resolved in CCPR or in the CAC, Codex members are requested to engage when budgets are discussed within the WHO.
 - FAO and WHO are asked to investigate how financial contributions from the private sector could be accepted to support the provision of scientific advice by JMPR and other scientific joint meetings or consultations while keeping FAO's and WHO's independence.
 - FAO and WHO are asked to invest more resources into permanent employees for the preparation of initial draft review documents for consideration by the JMPR expert panels. These additional resources could be created using additional funding from governments or via secondment of experts from governments for a 3–5-year period. Full-time reviewers for new compounds could also ensure more concurrent MRL setting with national MRL from countries where new compounds are registered first.
 - Use and implementation of Codex standards by members (Codex SDG Goal 3): the Codex secretariat is asked to regularly collect and publish updated information on progress of active adoption of CXLs by national governments and deferral policies for discussion in the CCPR and CAC meetings.
 - One commenter noted that there is low participation of experts from developing countries in JMPR activities and CCPR meetings and therefore proposes for facilitation to enhance participation. Considerations of geographical representation should be considered in capacity building of experts, data collection and wholistic participation in Codex CXL setting process.

IV. CONCLUSIONS

17. The EWG has concluded its work and prepared this paper based on the responses received to CL2022/75-PR and is presented for consideration by CCPR54.
18. A total of fifteen Member Countries and three Observer Organizations submitted comprehensive information in response to CL2022/75-PR. Based on these comments, there was consensus in the EWG that there is a need to enhance the operational procedures of CCPR and JMPR to address concerns related to both JMPR's current workload and future demand for compounds evaluations.
19. The EWG sets out a proposed two-step approach for consideration by CCPR. As a first step, this paper is submitted to JMPR for their consideration to identify initial priorities for enhancing its operational procedures and to report back on its findings to the following session of CCPR. At the second step, CCPR will consider the reply from JMPR and based on consultation with the CCPR, Codex, and JMPR Secretariats, as well as FAO/WHO, CCPR and JMPR should identify an appropriate approach to identify potential priorities for enhancement and major structural reforms and develop a roadmap for implementing both enhancements and major structural reforms.

Potential approaches could include commissioning an independent third-party organization to conduct an organizational assessment or working through an existing Codex advisory body or committee.

V. RECOMMENDATIONS

20. The EWG recommends CCPR54 to consider a proposed workplan and possible schedule to enhance operational procedures of CCPR and JMPR as follows:

First Step: 2023-2024

- (i) CCPR54 to submit this paper to JMPR, through the JMPR Secretariat, for consideration at its regular meeting in September 2023. The paper should be accompanied with the summary of the discussion that took place at CCPR54, based on comments received in reply to CL 2023/39-PR, and any additional recommendations (if any) for consideration by JMPR.
- (ii) JMPR to consider the request of CCPR54 and identify initial priorities for enhancing its operational procedures and report back to CCPR55 (2024) on its recommendations and specific areas that may require guidance from CCPR.

Second Step: 2024 and beyond

- (iii) CCPR55 to consider the reply from JMPR, and, based on consultations with CCPR, Codex, and JMPR Secretariats, as well as FAO and WHO between 2023-2024, CCPR and JMPR should identify an appropriate approach to:
 - a. identify potential priorities for enhancement and major structural reforms and
 - b. develop a roadmap for implementing both enhancements and major structural reforms