

# CODEX COMMITTEE ON PESTICIDE RESIDUES (CCPR53)

European Union Comments on

## AGENDA ITEM 13

Establishment of Codex Schedules and Priority Lists of Pesticides for Evaluation / Re-Evaluation by JMPR

**Mixed Competence  
European Union Vote**

The European Union and its Member States (EUMS) would like to thank Australia for the preparation of the schedules and priority lists of pesticides as well as the work done to incorporate the requests from members and sponsors.

### I. GENERAL COMMENTS:

According to the Codex Schedules and Priority Lists of Pesticides for Evaluation/Re-Evaluation by JMPR (for approval by Codex Alimentarius Commission) from 2017, 2018, 2019 and 2021 and the JMPR reports of 2018<sup>1</sup>, 2019<sup>2</sup> and 2021<sup>3</sup>, the following was observed.

Year	New compounds		New uses and other evaluations		Periodic reviews		Ratio (new compounds: new uses: periodic reviews) <b>which were evaluated</b>
	Planned (plus reserve)	Evaluated	Planned	Evaluated	Planned (plus reserve)	Evaluated	
2018 <sup>4</sup>	7 (+2)	8	20	19	5	2	4:9.5:1

<sup>1</sup> [Pesticide Residues in Food 2018 Joint FAO/WHO Meeting Report](#)

<sup>2</sup> [Pesticide Residues in Food 2019 Joint FAO/WHO Meeting on Pesticides Residues](#)

<sup>3</sup> [Report 2021 Pesticide Residues in Food Joint FAO/WHO Meeting on Pesticide Residues](#)

<sup>4</sup> [Report of the 49th session of the Codex Committee on Residues, Appendix XIV](#)

2019 <sup>5</sup>	7 (+1)	8	14 (+3)/20*	16/19*	7	4	2:8.75:1
2021 <sup>6</sup>	6 (+5)	6	30 <sup>7</sup>	3/30*	6 (+2)	2	2:16.5:1

\* Extra JMPR Meetings

The EUMS notes that the balance between new compound evaluations and periodic reviews was 4:1 in 2018 and 2:1 in 2019 and 2021.

The EUMS recalls that in 2017<sup>8</sup> at the CCPR, the Committee agreed that the 8:5 ratio (new compound vs periodic review) would be maintained, i.e. should the need arise, replace an old compound with a reserve old compound and likewise a new compounds with a reserve new compounds. For new compounds, eight evaluations per year seems to be feasible whereas for periodic reviews even with the substances in reserve the minimum goal has not been achieved.

No clear solution to the increasing backlog of substances for periodic review is proposed. With the current system of 2-4 periodic reviews per year with around 200 pesticide compounds in the Codex system, there will be basically no improvement and the frequency of review would result in an average time between reviews of between 50-100 years (not yet taking into account that more new compounds are added every year).

The EUMS considers that such long periods between periodic reviews do not meet the requirements of the risk analysis principles, neither in terms of the 15- and 25-year rules for scheduling periodic reviews. The EUMS considers that the absence of an updated risk assessment for periods exceeding 15 years a concern in itself as scientific knowledge and data requirements have evolved to ensure consumer protection. The EUMS therefore calls on the CCPR to take concrete steps to shift the ratio further towards periodic reviews and to do this rapidly.

## II. SPECIFIC COMMENTS:

### B. FINALISING THE 2023 PROPOSED SCHEDULE

#### Paragraph 5 and 6

The EUMS agree with the proposed schedule for new compounds and for new uses and other evaluations.

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<sup>5</sup> [Report of the 50th session of the Codex Committee on Residues, Appendix XIII](#)

<sup>6</sup> [Report of the 51st session of the Codex Committee on Residues, Appendix X](#)

<sup>7</sup> Initial proposal was to evaluate 20 substances and keep 10 in reserve but as the assessments were postponed to 2021, 8 additional substances were taken from the list "2021 new use-other".

<sup>8</sup> [Report of the 49th session of the Codex Committee on Residues](#)

## **Paragraph 7**

The EUMS support the five compounds that are listed for periodic review in 2023. The EUMS regret that not more substances had been listed for periodic review as only for permethrin (120), carbosulfan (145) and carbofuran (96) there is a preparedness for periodic review in 2023. For the rest of the substances the periodic review remains uncertain.

The EUMS have noticed that there have been cases where substances had been scheduled for periodic review, however the periodic review was then not completed as data was missing e.g. in case of ethoxyquin and guazatine. Further reserve substances should be added to be able to fill the gaps. The low number of listed substances does not solve the general problem with a steady increasing backlog of substances for which the last review was done more than 15 or 25 years ago (see also EU comments on CX/PR 22/53/13 – agenda item 11).

The EUMS regret that the re-evaluation for chlorpyrifos might be postponed again as already reiterated last year, based on the information available from the European Food Safety Authority serious human health concerns have been identified<sup>9</sup> and therefore a concern form on public health concerns was submitted by the EU on 13 March 2020.

The EUMS note a certain inconsistency between the industry's willingness to support enhancing the operational procedures to eliminate the backlog of evaluations on the one hand, including periodic reviews as expressed in the discussion paper prepared by CropLife International under agenda item 18, and the apparent lack of support to drive forward the periodic review process by submitting the appropriate data on the other hand.

## **D. PRIORITY LISTS 2024 AND BEYOND – TABLE 2A**

### **Paragraph 11**

The EUMS note with great concern, that 13 active substances were evaluated 25 years ago. In addition, there is no concrete proposal on how to handle these substances. Clear decisions on how to deal with substances for which data have not been submitted within a clearly defined timeframe are therefore needed urgently (see example on fenarimol below).

## **G. PERIODIC REVIEWS (UNSUPPORTED COMPOUNDS)**

### **Paragraph 14**

The EUMS are in favour of deleting compounds from the CCPR pesticides list that are no longer supported by a manufacturer and for which a public health concern has been identified. The withdrawal of the corresponding CXLs will reduce the number of substances for which a periodic review is needed. Therefore, the EUMS support the removal of related

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<sup>9</sup> [EFSA Statement on the available outcomes of the human health assessment in the context of the pesticides peer review of the active substance chlorpyrifos \(EFSA Journal 2019;17\(5\):5809\)](#)

CXLs from the CCPR pesticides list for amitraz PHC (122), fenbutatin oxide (109), carbaryl (8, reviewed JMPR 2019), 2-phenylphenol (56), dinocap (87), methamidophos (100), bitertanol (144) and terbufos (167).

The EUMS note that fenarimol was mentioned already in 2018 in the document CX/PR 18/50/13, i.e. the substance is now on the agenda for the fourth time without any decision. Within this time frame a sponsor would have been able to perform missing studies within the 4-years-rule.

The EUMS consider that maintaining CXLs that are not supported by submission of toxicology, residue and other relevant data, violates the requirements laid down in the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues. The EUMS acknowledge the work on a discussion paper concerning the management of unsupported compounds. Nevertheless, the respective discussion should not jeopardise or counteract the aim to perform a periodic re-evaluation of active substances as required. An extension of the period in case an existing evaluation will be outdated, i.e. beyond 25 years, is not acceptable.