

## CODEX COMMITTEE ON PESTICIDES RESIDUES

(Fifty-fourth Session)  
Beijing, China  
26 June – 01 July 2023

European Union comments on

### Agenda Item 9:

**Management of unsupported compounds  
without public health concern scheduled for periodic review**

**CX/PR 23/54/15 and CL 2023/37-PR**

*European Union Competence  
European Union Vote*

The European Union (EU) would like to thank the Electronic Working Group (eWG) on management of unsupported compounds without public health concerns scheduled for periodic review by JMPR chaired by Chile and co-chaired by Australia, India and Kenya for the preparation on the recommendations for the management of unsupported compounds without public health concern scheduled for periodic review.

The EU supports the adaption of the discussion paper.

### **Section 1 – Approach for the management of unsupported compounds without public health concern scheduled for periodic review**

- a) **General comments on the readiness of the approach to be adopted by CCPR54 and specific comments on possible improvements to the existing provisions or additional provisions, as necessary, for completeness, in order to finalize the approach at CCPR54.**

The EU in general supports the approach proposed in this section.

#### **Paragraph 1**

The EU notes that the new edition of the CAC Procedural Manual (FAO and WHO, 2023, Codex Alimentarius Commission Procedural Manual, Twenty-eighth edition, Rome, <https://doi.org/10.4060/cc5042en>) was recently published with some changes in the structure of the text, therefore the text of paragraph 1 be changed accordingly.

*“1. Unsupported compounds without public health concerns (PHCs) due for periodic review will be managed according to the periodic review procedures described in the Codex*

*Procedurales Manual, according to Section IV: Risk Analysis, Risk Analysis Principles Applied by the Codex Committee on Pesticide Residues, especially Chapter 5<sup>10</sup> “Risk management, Role of CCPR”, paragraphs 208 – 224<sup>10</sup>.”*

### **Footnote 10**

The EU noted that footnote 10 refers to the old, twenty-seventh edition of the CAC Procedural Manual and in addition, to the latest version, which is a contradiction. It could be adapted as follows:

*“<sup>10</sup> Codex Alimentarius Commission. Procedural Manual in its latest version. World Health Organization-Food and Agricultural Organization of the United Nations, Rome, ~~2019~~.”*

or, as a concrete text is cited, it might be useful to cite the newest version from 2023

*“<sup>10</sup> FAO and WHO. 2023. Codex Alimentarius Commission Procedural Manual. Twenty-eighth edition. Rome. <https://doi.org/10.4060/cc5042en>”.*

### **Paragraph 6**

The EU, as previously indicated in its comments on Circular Letter CL 2022/39-PR and CL 2021/44 PR would also welcome further discussions/reflections on how to support Codex Members, in particular developing countries, in moving gradually towards the use of lower risk substances. These discussions/reflections could take place within a future mandate of working group on Unsupported Compounds.

In the light of this, the EU proposes to add justifications by the member state(s) for the reasons to keep the CXL(s) as this would further clarify the need to maintain the CXLs and would already give the input for the possible future discussion on the use of lower risk substances.

*“6. In said communication, the member state must provide detailed information about which CXLs it is interested in supporting, as well as information on national register status, the surface (ha) of the crop treated with the pesticide, international trade data or others (e.g., availability of the alternatives etc.) that justify the efforts to generate data.”*

### **Paragraph 10**

The EU notes that overall process for generating data for the unsupported compound can be lengthy therefore, in order to treat those compounds similarly to others, the EU proposes to clarify that the timeframe has limitations i.e., the four-year rule applies.

*“10. For those compounds for which support is obtained, the member (s) should inform both the Chair of the EWG on Priorities and the Chair of the EWG on Unsupported Compounds whether all or some of the CXLs will be supported and should specify each supported and unsupported CXL and the timeframe for provision of relevant data to JMPR. The timeframe proposed for generating and providing data, should not exceed four-years (four-year rule as specified in the Codex Procedures Manual).”*

## Paragraphs 12 and 14

The EU notes that the new paragraph 1 has been added to the text therefore, the numbering has shifted compared to the former version. Consequently, the corresponding references in paragraphs 12 and 14 should be changed as follows:

- **Paragraph 12**

The text should be changed in the first line from “*according to points 5–9*” to “*according to ~~points~~ 6 to 10*”

- **Paragraph 14**

The text should be changed in the first line from “*described in paragraphs 5 to 9 namely*” to “*described in paragraphs 6 to 10 namely*”.

## **Section 2 – Options for efficient data support that could be addressed by Codex, FAO/WHO, JMPR, governments and industry to further assist countries in implementing the proposed management approach**

- b) **b. General comments on the various options available to the different stakeholders to implement the approach and specific comments on existing or possible additional provisions as necessary, for completeness, in order to finalize the options at CCPR54.**

The EU supports the collaboration activities suggested.

## **Paragraph 28**

The EU proposes to consider adding methods of analysis to the list for which the capacity building could be carried out:

*i. Field trials (residues)*

*ii. Toxicological studies*

*iii. Data submission within periodic review procedures*

*iv. Methods of analysis where necessary*”.