

CODEX COMMITTEE ON PESTICIDES RESIDUES
55th Session

Chengdu, Sichuan province, P.R. China
3-8 June 2024

European Union comments on

Agenda Item 11

Enhancement of the operational procedures of CCPR and JMPR
(CX/PR 24/55/10 and CL 2024/48-PR)

European Union Competence
European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) on Enhancement of work management of CCPR and JMPR chaired by United States of America and co-chaired by Costa Rica and Uganda for the preparation of CL 2024/48-PR.

The EU would like to make the following comments:

CX/PR 24/55/10 Para 26, Appendix I Short-term/long-term approach

The EU notes based on the feedback of JMPR in its recent report from 2023¹ and under Agenda item 5a (also referred to in Circular Letter CL 2024/43-PR) that the incomplete submission of dossiers is a recurring problem for JMPR and therefore this issue should be handled in the short-term approach as a priority.

EU notes that especially problematic is the data submission for substances under periodic review (also referred to in Agenda item 5a and Agenda item 10) and therefore suggests developing an efficient procedure which would for example preclude that existing Codex MRLs are maintained in the Codex system and aims to avoid that the compounds are rescheduled at each JMPR Meeting.

As also commented on Circular Letter CL 2024/43-PR, timely submission of complete dossiers, which has been outlined in the JMPR report² as a problem, could be tackled already now by sponsors taking the commitment to do so. It could be further improved as part of the targeted part of the short-term approach.

In addition, the EU has additional feedback to Appendix II “Summary of comments in response to CL 2022/75-PR Request for Comments on the Need to Enhance CCPR/JMPR and

¹ Section 2.5: On the rolling submission of data. FAO & WHO. 2024. Report 2023: Pesticide residues in food – Joint FAO/WHO Meeting on Pesticide Residues. Rome. <https://doi.org/10.4060/cc9755en>

² Section 2.5: On the rolling submission of data. FAO & WHO. 2024. Report 2023: Pesticide residues in food – Joint FAO/WHO Meeting on Pesticide Residues. Rome. <https://doi.org/10.4060/cc9755en>

the associated opportunities and challenges (For information)” that could be relevant for the future work.

CX/PR 24/55/10, Appendix II Table 1 “Summary of comments on opportunities for Enhancement to CCPR /JMPR an associated challenge

1. Table 1, Data Sponsor Dossier and Electronic Data Submission

- Bullet point 1: The EU notes that according to the last JMPR report¹, the format of dossiers is less of an issue than the completeness of original study reports and alignment of information relevant for the assessment from different sources (e.g., identical naming of common metabolites across different compounds/sponsors). Electronic submissions are usually accepted, either in the form of folders with pdf documents or container formats like Caddy XML.
- Bullet point 6: The EU supports exploring options to improve templates. In order not to add extra burden to JMPR Experts, the EU suggests tasking this issue to a third party, which may collect interviews/needs from all stakeholders (e.g., JMPR Experts, Sponsors, Editors, FAO/WHO Secretariat) and suggest a common approach.
- Bullet point 9: The EU supports the comment, however the provision of the same data submitted to national authorities represents the minimum. The data considered, may differ as well as assessment practice. The EU emphasizes that JMPR requests all data available in relation to the setting of HBGV and consideration of GAPS.

2. Table 1 CCPR Processes and Procedures, Schedule and Priority List

- The EU notes that increasing the number of uses in addition to a full evaluation of a new substances might be too big of a burden for one expert to evaluate within one year.

3. Table 1 CCPR Processes and Procedures, Criteria for Periodic Reviews

- Bullet point 1, 2. sentence: The EU notes that the claim that CXLs can be retained if GAPS remain unchanged is confusing. The idea of a periodic review is a renewed assessment according to the current state of scientific knowledge, which has usually improved significantly in the meantime. Although maintaining a CXL is desirable, many aspects have changed such as the criteria for defining the residue, HBGV or use of the OECD MRL Calculator, which alters the outcome.
- Bullet point 2: The EU notes that the extension of the period will not reduce the number of periodic reviews but will stretch the interval. In the next few years, less reviews become necessary but, in the end, the number of compounds to be assessed remains the same.

4. Table 1 CCPR Processes and Procedures, Pesticide MRL Database

- The EU encourages Codex Secretariat not only to provide a Codex MRL database but an up-to-date commodity database including adopted recommendations for representative group commodities and minor commodity classifications.

• Table 1, JMPR Evaluation Process and Procedures, Working Procedures

- Bullet point 1: The EU notes that in this section it is stated that the main bottlenecks are the capacity and limited number of experts rather than the processes and procedures within the JMPR. The EU would like to outline that an increase in experts would not lead to an increased number of substances that can be discussed during the JMPR

Meeting. Their agendas are already fully booked, and extension of the two-week meeting is not desirable.

- Last bullet point: Given the complexity in finding a residue definition, as currently seen in the process of updating the OECD Guidance Document on residue definitions, residue, and toxicological assessment work hand in hand nowadays. Relevance of metabolites relies both on hazard and occurrence in parallel. By shifting toxicology to another year than the residue assessment, re-discussion will become necessary afterwards and de-facto two years will be required by the WHO group.

CX/PR 24/55/10, Appendix II Table 2, Summary of Comments on Opportunities for Major Reform to CCPR/JMPR and Associated Challenges

Table 2, Other Areas of Reform, Scope of Evaluations and Default MRLs

- Bullet point 1: The EU notes that the range of affected commodities is given by the GAP and the supporting residue data. Especially for the mentioned feed commodities, an assessment would anyway become necessary to estimate the dietary burden of livestock and residues in animal commodities. By narrowing the scope of commodities to be considered, the importance of Codex MRLs for trade and as safety values in terms of consumer protections would be then weakened.