# ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 53rd SESSION OF THE CODEX COMMITTEE ON PESTICIDE RESIDUES

*4th – 8th and 13thJuly 2022 | Virtual Meeting*

## AGENDA ITEM 7(a)

*Revision of the Classification of Food and Feed (CXA 4-1989): Establishment of MRLs for Pesticides for Okra*

### Objectives

This document offers a review and analysis of the agenda items planned for discussion at the 53rd session of the **Codex Committee on Pesticide Residues (CCPR)**, scheduled to take place virtually July4th – 8th and 13th, 2022. This document is intended for possible use by the Codex communities of practice, promoted by GFoRSS and PARERA, as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above (PARERA and GFoRSS), their membership or their management. It provides a synthesis and analysis of the work currently under discussion by the CCPR, which may be useful for delegations from Arab countries to prepare their positions taking into account the needs and specificity of the region and the potential impact of the proposed food standards.

This analysis is prepared as part of the **Codex Initiative for the Arab Region**: *Arab Codex Initiative*, implemented by PARERA and GFoRSS, hosted and coordinated by the Arab Industrial Development, Standardization and Mining Organization (AIDSMO) and funded by the US Codex Office, US Department of Agriculture.

The focus of the analysis of agenda item 7 (a) of CCPR53, relates to **the establishment of MRLs for pesticides for okra.**

*\*It is important to note that experts – members of the Arab Expert Working Group – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the Arab Expert Working Group proceedings is based on each expert's own credentials and experience, which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

## Agenda Item 7 (a) : Establishment of MRLs for Pesticides for Okra

*Documents*

CX/PR22/53/6 and CX/PR 22/53/6-Add.1

*CCPR53 (2022) is invited to consider the issue of okra and the selection of an appropriate representative commodity taking into account the submitted monitoring data.*

*Background*

CCPR51 (2019) noted the need to find a solution for extrapolation of an MRL for Okra. In exploring further this matter, Kenya offered to submit trial data and monitoring data. CCPR also encouraged member countries and interested organizations to submit data from residue field trials as well as monitoring data for consideration by JMPR.

The questions posed are the following:

❖ In the absence of specific data for okra, what scientific evidence would JMPR consider in proceeding with extrapolation of existing data to derive an MRL for Okra that can ensure the protection of public health while facilitating trade.

❖ Request comparison of monitoring data for okra and other fruiting vegetables to determine if differences in residues observed in trade between these commodities are similar to the difference observed in supervised trials and hence confirm extrapolation principles.

CCPR52(2021) agreed to re-establish the EWG on the revision of the Classification, chaired by the United States of America (USA) and co-chaired by the Netherlands and to consider the issue of okra and an appropriate representative commodity from which MRLs for okra could be extrapolated taking into account monitoring data submitted.

The EWG considered the issue of okra and finding an appropriate representative commodity, taking into account submitted monitoring data from Canada and India.

*Analysis*

Citing previous 2008-2017 monitoring data, Canada noted only 5 cases where residues detected in okra were greater than both residues in chili (non-bell) pepper and tomato and only 2 cases where residues detected in okra were greater than residues in chili (non-bell) pepper. In these cases, residues found in okra were all below established chili (non-bell) tolerances (MRLs). In updated Canadian monitoring data (2017-2018, Appendix II of working document CX/PR22/53/6), only one sample had a residue higher than the Codex MRL for the representative commodity, and this value was significantly lower than the US tolerance of 5 ppm for chili pepper (non-bell) pepper. Canada also noted that, in monitoring data from India, only 40 out of 1075 okra samples had a residue value higher than the Codex MRL for Chili pepper as a possible representative commodity.

Given the available monitoring data (Canada, 2008-2017 and 2017-2018) and India (2012-2019), Canada proposed the use of chili (non-bell) pepper as the representative commodity for okra, where **two options are available**:

❖ **Option 1**, add a comment or footnote to Subgroup 12B in the Classification as follows:

| Group 12B, Pepper and pepper-like commodities | Sweet Pepper and Chili pepper | Peppers (VO 0051): Martynia; Okra (only data from Chili pepper can be used to set a CXL); Peppers, Chili; Peppers, sweet; Roselle |
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❖ **Option 2**, Move Okra to a separate subgroup in the Classification as follow:

| Group 12D, Okra | Chili pepper | Okra (VO 0442): Okra |
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*General Comments*

Australia noted the difficulty in drawing conclusions from monitoring data (okra from the USA) and the lack of a comparison to tomato and pepper and lack of information in relation with Good Agricultural Practices (GAP).

Germany, in its initial comments, noted the difficulty in drawing a conclusion while not characterizing the GAP behind the okra residue data, but noted in a second set of comments that the Canadian proposal is a pragmatic approach to handle the available data.

*Overall Considerations*

Based on monitoring data provided by Canada and India, chili pepper (non-bell pepper) is proposed as the representative commodity for Okra based on the low exceedances for okra and the sufficient conservatism in MRLs derived using the OECD MRL calculator to be protective of actual residues in Okra.

*Conclusion and recommendations*

Okra is a traditional vegetable crop with considerable area under cultivation in Africa and Asia and with very important socio-economic potential in West and Central Africa. It is also an important crop and an important food commodity consumed in the Arab region. However, Okra has been considered a minor crop and no attention was paid to generating occurrence data regarding pesticide residues in this commodity.

❖ The Arab Codex delegations may question the choice of Chili pepper as a representative commodity of Okra, while it does not seem to be a crop sharing similar attributes of aspect, texture, taste and consumption, as well as agricultural practices. Eggplant could be considered as a crop / commodity with closer attributes.

❖ Arab Codex delegations may suggest to re-instate the EWG with a commitment for a stronger contribution from Arab codex delegations who would commit to work with the co-chairs of the EWG: the US and the Netherlands to canvass more monitoring data on other crops and assess similarities in agricultural practices and consumption patterns with the objective to identify a surrogate to support extrapolation.
It is recommended that Arab Codex delegations support the option where Okra would be considered in a separate subgroup in the classification.

❖ In general terms, and considering the importance of Okra as a commodity for the region, it is recommended, at the Arab/regional level, that:

▪ Monitoring programs be devoted to this commodity in the Arab region;

▪ Existing monitoring data for pesticide residues in Okra in the Arab region be assembled and reviewed;

▪ Arab countries submit their pesticide residue monitoring data for Okra and pool such data for further analysis and support to this Codex work.

▪ This work be supported with the establishment of a regional (Arab) Expert Working Group to help collect monitoring data for Okra in the Arab region. This could be further conveyed to the Arab Expert Working Group on Food Safety under the auspices of the League of Arab States.