

MINUTES

Prepared by:	CropLife International
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To:	Participants and invitees of the Global virtual workshop on Codex CCPR/JMPR enhancement organized by CropLife International

Title: **Summary of the global virtual workshop on Codex CCPR/JMPR enhancement organized by CropLife International**
Date: **31 March 2022, 12-15 h CEST**
Venue: **MS Teams**

Introduction

On the 31st of March 2022 CropLife International met virtually with over 50 delegates from government, FAO, WHO and Codex to discuss how the setting of Codex MRLs for pesticide can be enhanced to meet the increasing demands put on the JMPR & CCPR. This increased demand has been magnified by the COVID pandemic; however, these challenges have been apparent to most of us who work with the JMPR/CCPR process for the last few years.

This workshop built on eight meetings CropLife International held with various groups at the country or regional level held over the previous ten weeks.

Outcome

Through-out the workshop a few word clouds were developed by workshop delegates which clearly indicate there is a lot of support for the Codex system, that there is much value in the CXLs established by CCPR & Codex, and that there is a lot which can be done to enhance the Codex system and its supporting bodies. The questions asked appear below and the word clouds responding to these questions can be found in the appendix:

- Codex today: what is great about Codex?
- Codex from scratch: what are your ideas?
- From the proposed solutions in the pre-read which ones are the most important to you?
- What is the value of Codex?

The discussion at the workshop showed that there is not a single or simple solution. The desired enhancement can only be achieved jointly and will require efforts from all involved in Codex. CropLife International is committed to enhancing Codex and felt that many workshop participants share the commitment and passion for Codex.

Data submitters

There was good quality feedback given by many JMPR experts on how the quality of dossiers could be improved. In comparison to other offered solutions this feedback may be relatively low hanging fruit. The CropLife International team that organized this workshop will direct this feedback to the appropriate representatives in CropLife

International member companies; further, since CropLife International doesn't represent all data submitters this feedback will be shared with non- CropLife International data submitters. Some key points raised in the workshop were:

- Make sure the residue data matches the label
- Maximize the number of commodity MRLs requested in a submission
- Provide all the available data; it is relatively easy for reviewers to see what has been submitted in other parts of the world
- Formatting and providing submission materials that allow for reviewers to copy, paste and easily edit tables is important
- Tables should be in portrait and not landscape
- Key tables entered into a spreadsheet would make it easier for JMPR experts to conduct statistical analyses
- Standardized table format would be beneficial (is this something industry and JMPR can collaborate on?)
- File naming format- have file names which reflect the contents of the file
- Need better consistency of naming of metabolites
- For compounds used as both veterinary medicines and crop protection products try to better coordinate data submissions to JECFA and JMPR

JMPR process

There was a general feeling that JMPR processes, whilst not perfect, was not the main impediment to Codex establishing more MRLs. Practice has shown that JMPR meeting virtually is less efficient and less productive than meeting face to face (refer to both JMPR reports from 2021 for further information on this). The use of virtual meetings has however proved to be useful in the peer review process prior to the JMPR and has led to better quality of evaluations being discussed during the meeting. Additional meetings also won't help with establishing more CXLs, at least not with the current pool of available experts. The experts only have a limited amount of time in a year to focus on JMPR activities, and simply having more meetings doesn't give them more time.

JMPR resources

The resourcing of JMPR proved to be the area where many of the workshop delegates felt would make the biggest positive impact in enhancing the Codex MRL setting process. Currently most of the JMPR experts are volunteers and we are all grateful for their participation in the Codex process, but more experts are needed to expand the capacity of the JMPR panels. Some ideas proposed were:

- Industry experts to volunteer to review compounds where there is no conflict of interest
- Have retired industry experts volunteer to be JMPR experts
- Industry needs to raise the profile of the work the experts do with their employers and their governments; let them know their work is appreciated and is making a difference
- Enable funding to allow additional experts from national regulators to work through the COVID backlog
- Support the JMPR expert by getting pre-work completed by consultants or permanent FAO/WHO staff, e.g. summarizing studies

- Have a core group of full-time employees of FAO /WHO to undertake the initial assessment work and have the volunteer experts use their experience to make the final proposals
- Have the JMPR secretaries work fulltime on JMPR activities

Increased sustainable funding of JMPR

There was clear support that increased and sustainable funding of the FAO, WHO and JMPR is needed to make a significant difference in enhancing the Codex process. Increased, predictable and long-term funding from Governments could clearly be used to hire permanent evaluation staff to be deployed within JMPR to best effect. Some options were proposed, and clearly additional discussion needs to be had to define the best model for when additional funds are available.

Increased funding could be used to train additional experts especially from underrepresented geographies within JMPR. Additional funding could also be used to allow the current JMPR secretaries to focus full time on JMPR or to support the JMPR experts and the Joint Secretaries with additional consultants and it could also better support the travel, accommodation and stipend of experts during JMPR.

The biggest challenge discussed at the workshop was how to convince governments to make more funds available and having the funds directed to the right areas to support JMPR / CCPR work. Also important was that stable and predictable funding (e.g., at least 5 years) would need to be established. FAO and WHO are member driven organizations and so changes can be made if members (e.g., national governments) want change. Significant advocacy needs to occur both within Codex and outside of Codex, such as with FAO, WHO, and obviously with member countries.

The idea of private sector funding should not be ruled out. There would need to be restrictions to such funding and such funding should be categorized as grants (e.g., avoid potential bias and the perception of bias) and it is worth exploring.

Miscellaneous

Towards the end of the workshop participants were encouraged to think outside the box and consider what could be done differently to improve the system. The topic of using national reviews as a starting point for the JMPR evaluation was proposed. For this to work, data protection and general intellectual property rights need to be considered; however even under today's system these potential concerns can certainly be overcome if the data owner (typically the sponsor or data submitter to JMPR) made the national reviews available along with the other data and information in their submission. A key point for this potential enhancement is that the subsequent JMPR review would need to continue to follow JMPR procedures, rules, and requirements in order to have the JMPR / CCPR process remain independent.

Rather than running on an annual cycle, if JMPR was well resourced the setting of Codex MRLs could become an ongoing process - as happens in most regulatory national agencies today.

It was noted that the challenges being faced in the setting of Codex CXLs for pesticides can be seen in all other Codex committee. Rather than focus on pesticides alone perhaps it would be better to focus on all areas of Codex or to partner with similar Codex committees, especially in enhancing how scientific advice is provided; such a crosscutting view of Codex or partnering may allow for more political support for enhancements than simply focusing on pesticides.

Next steps

1. CropLife International will draft a discussion paper for consideration by delegations at CCPR53. This paper will propose an eWG be established or the terms of reference of an existing eWG be adjusted to further consider how the system can be enhanced to better meet current day demands.
2. CropLife International will direct the feedback with data submitters on how the quality of dossiers could be improved.
3. CropLife International encourages all stakeholders to consider the output of this workshop. CropLife International would be happy to participate in any relevant discussion that could further consider some of the proposals for enhancement put forward.
4. CropLife International will work to identify opportunities to continue outreach especially to advocate for greater support of the JMPR expert panels, and increased and sustainable funding from member governments. These opportunities could include one on one discussions with Governments, engagement with Codex regional committees, and WTO meetings. CropLife International will also consider investigating the possibility of industry providing funding to augment the enhancement of JMPR/CCPR.

Codex today: what is great about Codex

The diagram is a word cloud centered around the word "international". Other prominent words include "science based", "harmonization", "cooperative", "transparent", "global", "collaboration", "trade", and "community". The words are colored in various shades of blue, red, green, and orange. Surrounding the central words are numerous smaller, colored text fragments that describe the Codex's nature and purpose.

international
science based
harmonization
cooperative
transparent
global
collaboration
trade
community
an international
growers support
co-operation
science bases
protects consumers
multilateral
scientific basis of codex
bringing people together
international cooperation
top experts
trasnparent
standardised
support trade
international work
expertise
neutral
agreement
consensus
cooperation
standards
inclusive
independent
logical
collegial
universal
support trade
consensus building
scientific rigor
collaborative
promotes harmonization
worldwide participation

Codex from scratch: what are your ideas?

Real time data submission

Engage & motivate members

use global joint reviews of new actives

better adoption from members

Scientific reviewers dedicated (at least 2 years) to the process

Published submitter and review guidelines

Fully structured and resourced system throughout.

basically the same, just with a more secure funding basis for support and enabling functions, e.g. scientific advice

Invite all countries and observers who can make a contribution. Have a robust, sustainably funded science programme to provide timely risk assessments. Have inclusive, transparent processes. Work quickly!

Codex from scratch: what are your ideas?

open access to data

MRLs are not a health standard

leverage national actions in review of old chemistry to feed into discussions

More scientific based

Include sustainability and environmental aspects

Flexible meetings and structure

Agree a common set of core data requirements

Build on work done by member country regulatory authorities

List available summary reports from applicants and authorities

Codex from scratch: what are your ideas?

To strengthen the cooperation between JMPR and national/regional assessment authorities. Rely on assessments of other authorities.

Develop a global electronic system for registration of all studies and supporting dossiers.

stronger legal basis for recognising CXLs

Enforceable/enforced timeframes for the standard setting process

Leverage on national reviews

Stronger development/inclusion of developing countries

Dedicated science staff as integral part of Codex

Better coordination with JMPRClear rules about what is within CODEX purview

Open access to data

Codex from scratch: what are your ideas?

joint reviews

Fully funded

Scientific reviewers engaged and retained

Paid experts from regulators and academia for a set period of time

Align procedures to the 21st century

Create a single risk assessor body that is well funded

ongoing work in EWG instead of committees - annual supervision by the Commission

Match national productivity for MRL approval

Strengthen the science based decisions

Codex from scratch: what are your ideas?

List countries MRLs

dedicated evaluators

Take into account environmental issues

Balanced, collaborative relationship with the private sector/regulated community

better resourced

Data base on available studies

Better coordination /leverage with national authorities

encourage stronger commitments from national regulators to support scientific work

Make it bigger. More people, more funding.



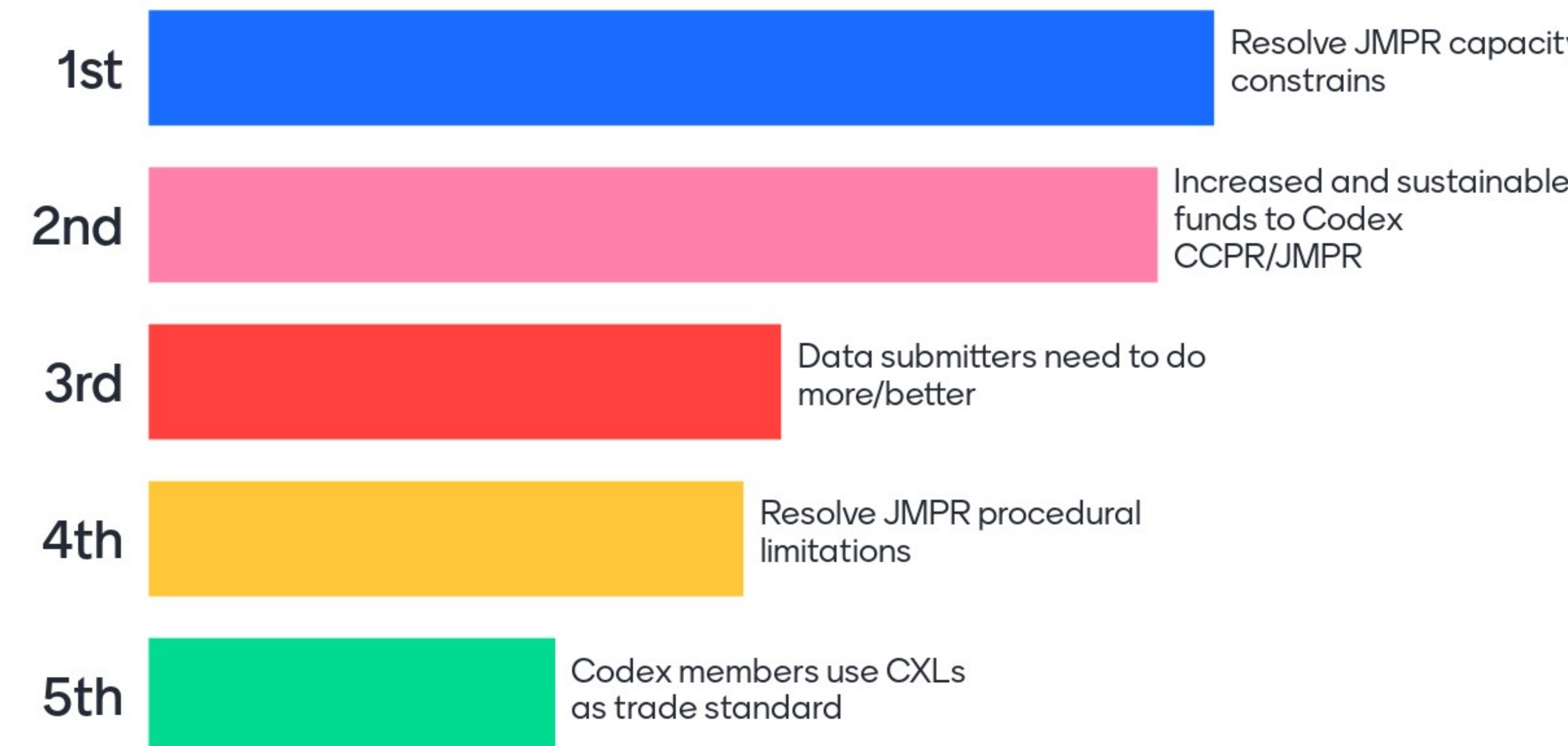
Codex from scratch: what are your ideas?

Global risk management perspective, not national

Digital system linked to national agencies and WTO-SPS



From the proposed solutions in the pre-read which ones are the most important to you?



What is the value of Codex?

independent
recognised
credible

food safety
international
science
sustainability
equitable
consumer protection

adopted by all 198 member

confidence in mrls
best science
science-based

scientific integrity

food security

support

independence

global trade
cooperation
import safety

transparency

not influenced by politic

trade enabling

international expertise

global validation

facilitate trade

harmonisation

harmonization

science based

trade