



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON PESTICIDE RESIDUES**

**50th Session
Haikou, P.R. China, 9-14 April 2018**

**Information on national registrations of pesticides
(Based on information submitted in reply to CL 2018/17-PR)**

(prepared by the Electronic Working Group on Priorities chaired by Australia and co-chaired by Germany)

Background

1. Following discussion at the 48th Session of the Committee on Pesticide Residues (CCPR48 – April 2016), the Committee agreed to the preparation of a circular letter (CL) seeking information from Member countries regarding national registrations for all compounds on the CCPR Pesticide List. In addition, for each pesticide, the CL would ask Member countries to list commodities for which a registered use was in place. The Committee further agreed that this work would be carried within the framework of the Electronic Work Group (EWG) on Priorities chaired by Australia and co-chaired by Germany.¹
2. The main objective of the exercise is documented evidence of national registrations and additionally to list commodities for which a registered use was in place. This will improve administration and management of the Priority Lists and Schedules. The exercise started with compounds listed in Tables 2A and 2B. Nevertheless, in CCPR 48 it was announced that all compounds on the CCPR pesticide list should undergo the exercise to facilitate the main objective. A list of national registrations including registered uses in place may help decision making on compounds no longer supported.
3. Australia, with the assistance of Germany, prepared a spreadsheet (excel file) and asked Member countries to complete the spreadsheet with information relevant to the compounds listed at the time in Tables 2A and 2B of the CCPR Schedules and Priority Lists.
4. The outcome was presented and discussed during CCPR49 (April 2017). The Committee agreed that Australia and Germany would continue to work of the National Registration Database and that a CL should be issued seeking further input to the database. In addition, the Committee agreed that the CL would introduce further ideas on the management of the database and consider whether or not to broaden the scope of the database to include all compounds listed on the CCPR Pesticide List.
5. The Committee noted that the Codex Secretariat could assist in the establishment of a web-based platform in the Codex website to “house” the national registrations database which would allow each Member country to upload updates and revisions to respective country-specific worksheets. The Committee supported this initiative.²
6. After CAC49 a further evaluation of the overall spreadsheet was conducted by the Chair and Co-Chair of the EWG on Priorities (Australia and Germany). It became evident that further clarification was required concerning the information Member countries are requested to enter into the database. This includes:
 - clarification that only registered or approved uses should be included in the database,
 - that uses should be reported for grouped substances like dithiocarbamates separately,
 - that uses in animal premises and/or for direct external use on animals should be covered by the database,
 - to use the actual Classification of Food and Feed (CXM 4-1989).

Therefore a revised version of the spreadsheet was set up and made available to Member Countries.

¹ REP16/PR, paras. 180 and 183

² REP17/PR, paras. 176 and 177

7. By Circular Letter CL2018/17-PR (January 2018) Member Countries were asked to repeat the exercise from the previous session and for 24 additional substances.
8. Finally, Member countries were asked to comment on some question dealing with the future processing of the database.

Results

9. In total 33 Member countries (out of 188 Member countries) filled the national registration spreadsheet and answered the questions. They are Australia, Austria, Belgium, Brazil, Bulgaria, Canada, Chile, Colombia, Czech Republic, Ecuador, Egypt, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Japan, Kazakhstan, Lithuania, Morocco, Netherlands, New Zealand, Norway, Poland, Portugal, Republic of Korea, Slovakia, South Africa, Sweden, Thailand, and the United States of America (USA). Most of the spreadsheet were provided via the Codex portal and could be retrieved from the portal. Answers to the questions were sent by email to the Chair of the EWG on Priorities (Australia).
10. The above shows the following geographic distribution of the replies:
 - 0 country from the Caribbean
 - 1 country from Africa (South Africa)
 - 1 country from Central-Asia (Kazakhstan)
 - 2 countries from Near East (Egypt and Morocco)
 - 2 countries from North America (Canada and USA)
 - 2 countries from South-West Pacific (Australia and New Zealand)
 - 3 countries from Asia (Japan, Republic of Korea and Thailand)
 - 4 countries from Latin America (Brazil, Chile, Colombia and Ecuador)
 - 18 countries from Europe (Austria, Belgium, Bulgaria, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Lithuania, Netherlands, Norway, Poland, Portugal, Slovakia and Sweden). During the first exercise European Commission compiled the responses from EU Member States.
11. Most of the replies indicate registered uses for the pesticides for which such information were requested with a few exceptions e.g. for endosulfan (32) and oxydemeton-Methyl (166) no countries indicated registered uses. The replies allow to differentiate between substances that are widely registered and those with limited registrations. A few replies indicated very limited registration (one – three Member countries indicated registered uses) e.g. only one Member country indicated registered uses for the following pesticides ethoxyquin (35), parathion-methyl (59), phosalone (60), dimethipin (151). In case of flumethrin no registered use in primary food commodities of plant origin was reported. Only one Member country (Australia) reported a use on animals. This might be due to the fact that the use on animal skin or in animal housing is not registered as a use of a pesticide in all Member countries, e. g. in the EU it may fall under biocidal or veterinary regulations.

National Registration Database

12. The single excel spreadsheets were compiled in one file. An additional table was added covering the substances and the answers from Members to the question whether the substance is registered or not. In the last column the answered stated "Y" are counted. The compiled file is available at the following link:

http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/CCPR50/20180322_National_Registration_and_Uses_overall_protected_CCPR50_2018.xlsx.

For the list of participants see Annex I of CX/PR 18/50/13.

13. From this exercise a few point arise that need further clarification for the future.
 - a) An active substance is registered, but not used on edible crops. How to fill the tables?
This point might be of interest for toxicological evaluation. It is proposed to allow in future to indicate this with a third letter beneath "Y" and "N".
 - b) For substances used in tea and post-harvest the given columns are not sufficient to indicate certain uses.
Columns for crop/crop groups of type 12 "Secondary food commodities of plant origin (1993)" to cover post-harvest uses in dried commodities and for crop/crop groups of type 13 Derived products of plant origin of plant origin (1993) to cover uses in teas are missing.

- c) Unfortunately, five substances from the first exercise were lost. They will be added in a later exercise.
- d) USA commented that they only inserted crop/crop group information for Captan. They can supply the remaining data in this format, but have some concerns with the structure of the data table. In particular, a tabular format normally implies a relationship across columns, but in the table Column B (Pesticide) has independent relationships with Column D-I. In row 6, for example, there is no relation between Apples (Column D) and Beans (Column E).

USA can manually convert their data to this format, but would like to set up an approach that can be automated using MS Access or another database application. The data format on the tab "2017 USA Summary Data" may be more appropriate. It is recognized there are a large number of member countries, so consensus will be needed on whatever format is adopted.

The proposal will only work with a database that do not exist at the moment.

Responses to questions

14. With CL 2018/17-PR three questions concerning the future work with the National Registration Database were asked.
- a) It is suggested that no more than 20 – 30 active substances should be added to the National Registration Database each year. Do Member countries consider this to be an acceptable and manageable number?
 - b) From time to time the content of the National Registration Database needs an update concerning registered uses. Is a 5 year cycle acceptable?
 - c) The Chair and co-chair of the EWG on Priorities propose to publish the complete National Registration Database in a non-changeable format. Member countries should store the entries into their Member database and update their Member database as requested. We kindly request your views on this proposal on the way forward.
15. The majority of answers agree with the proposals made.

For Question (a), some Member countries clearly noted that more substances may overload their capacity.

For Question (b), some alternative proposals were made by Member countries. A proposal was made for 2-3 years cycle to the dynamics of the national records in the countries.

As an alternative approach it was proposed that Member countries should have access to make modifications, when they occur in a period shorter than the proposed 5-year cycle. This proposal was made by a second Member country in a more general way. It was proposed that each country, where applicable, make any changes to the registration status of pesticides from previous years.

The question of a shorter cycle is attractive but we should keep in mind that a shorter cycle will add to the workload to the new substances each year. A change of the registration status, whenever this changes in Member Countries will be fine. But for the moment we are working with excel spreadsheets having no sufficient track change mode. This will add to the workload compiling the overall file. The proposal should be keep in mind to be discussed when starting with a real database.

For Question (c), a proposal was made that Members, while maintaining the database should add each year a tab to their own database for each new/yearly request, as per the circular letter. This proposal should be considered. Furthermore, a concern was mentioned on the accessibility. It was stated that at the first stage, the accessibility should be limited only to the working group members. Once the database is completed then it can be publish to all.

Conclusion

16. From the responses received the importance of the NRD can be seen. A few technical problems can be solved in before the distribution of the next Circular letter.
17. Based on the number of replies received, their geographic distribution and the information they provide on registered uses, there is a need to further collect information before addressing compounds in Tables 2A, 2B and 3 in terms of their evaluation or re-evaluation by JMPR. Submission of such information can be improved by addressing the points raised in paragraph 13 in a revised spreadsheet while giving additional time for Member countries who replied to the CL to refine the information submitted and for those Member countries who did not reply to the CL to provide such information. Meanwhile, no further action should be taken on compounds listed in Tables 2A, 2B and 3 which should continue to be examined through the regular establishment of Codex schedules and priorities lists (EWG on Priorities).

Recommendations

18. Concerning the accessibility of the files a short discussion on the different ways to handle the files with some pros and cons might be useful.
19. It is proposed to continue the work on the National registration database with 20 - 30 substances each year and a 5 year cycle. The national database should be maintained by each country. The consolidated database of all National Registrations be posted on the CCPR website as "read only" to maintain its integrity.
20. Discussions are necessary in future on setting up a database instead of using excel spreadsheets.