



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

49th Session

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COMMENTS on Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 021 - Grasses for sugars or syrup production), submitted by Canada, Ecuador, European Union, Kenya, Uganda, United States of America, African Union

Canada

Background:

- At the 48th Session of CCPR (April 2016), it was agreed that the EWG on the revision of the Classification would continue work on Group 021 Grasses for Sugars or Syrup Production.
- The EWG was requested to look into the possible expansion and grouping of this Group including the possibility for multiple entries of commodities in different groups of the Classification.

Current Status of the Work of the EWG:

- There was agreement that a commodity should only be included in one group to avoid the possible confusion of having two different CXLs for the same commodity. However, it is acceptable to include the same commodity in different groups if the part of the plant is different (e.g. radish roots and radish leaves).
- The EWG agreed to maintain Group 021 Grasses for sugar or syrup production as currently established.
- A new group would be established for "Tree Sap producers". Two options are being considered for this group:
 - Option 1 would be to include the group in Type 04 and rename Type 04 from "Nuts and Seeds" to "Nuts, seeds and saps".
 - Option 2 would be to create a new Type for Tree sap.
- An additional question with respect to Group 021 is whether the "Portion of the commodity to which the MRL applies (and which is analyzed)" should be "Whole commodity"

Request to CCPR:

CCPR has been asked

- to consider maintaining Group 021 Grasses for sugar or syrup production as currently established with the creation of a new group for "Tree Sap producers".
- to comment on the options proposed for the location of the "Tree Sap producers Group", either under a new Type created for the group or included in Type 04, re-named "Nuts, seeds and saps".
- to comment on the proposal that the: "Portion of the commodity to which the MRL applies (and which is analyzed)" for Group 021 would be "Whole commodity".

Canada's Position on the Revised Grasses for Sugar or Syrup Production (Group 021)

- As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the revised grasses for sugar and syrup production.
- Canada is in agreement with maintaining Group 021 Grasses for sugar or syrup production as currently established.
- Rather than create a new "Type" which would include only one Group, Canada is in agreement with the EU proposal to include the new group for "Tree Sap producers" under Type 04 and rename this type as "Nuts, seeds, and saps".
- Canada is in agreement that "Portion of the commodity to which the MRL applies (and which is analyzed)" for Group 021 be the "Whole commodity".

Ecuador

Ecuador thanks to United States of America and the Netherlands for the work done by electronic means on the proposed draft revision of the Classification of Foods and Animal Feeds at Step 4: Selected commodity groups (Group 021 - Grasses for sugars or syrup production).

After analysing the document (CL 2017/20-PR), Ecuador supports to keep Group 021 Grasses for sugars or syrup production and to create a new group that will include other plants which are used to produce sugar or syrups, and to consider that these should be included in a single group or subgroup to avoid confusion of CXL.

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group on the revision of the Classification of food and feed chaired by the United States of America and co-chaired by the Netherlands for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds, in particular for the crop group 021 - Grasses for sugars or syrup production.

The European Union (EU) would like to submit the following comments to the document CL 2017/20-PR.

The EU agrees with the proposal to maintain the group 021 Grasses for sugar or syrup production as currently established and to create a new group for "Tree sap producers". The new group could be included in Type 04, which already contains commodities produced from trees, to be renamed "Nuts, seeds and saps".

As regard the "Portion of the commodity to which the MRL applies (and which is analyzed)", the EU notes that the description "Whole commodity" would be in contradiction with the first paragraph of the standard of the group, which indicates that only the stems are used for sugar production, while the leaves, ears and several wastes are used as animal feed.

The EU considers that in case the tree sap producers will be moved out of the group 021, only the commodities GS 0658 Sorghum or Sorghum, sweet and GS 0659 Sugar cane will remain in the group. In this case a more detailed definition of the "Portion of the commodity to which the MRL applies (and which is analyzed)" can be applied to both sweet sorghum and sugar canes. The EU proposes to use the description "Stems".

In this case, also the additional descriptor "(stalk)" proposed by Japan for the commodity GS 0658 Sorgho or Sorghum (sweet), would not be necessary.

Kenya

Issue:

The 48th Session of CCPR (CCPR48) agreed that the Electronic Working Group on the revision of the Classification chaired by the United States of America and co-chaired by the Netherlands would continue to work on Group 021 Grasses for Sugars or Syrup Production to look into the possible expansion and grouping of this Group including the possibility for multiple entries of commodities in different groups of the Classification and report back at the next session with a proposal for consideration.

The Electronic Working group proposed to include a new group for "Tree Sap producers" and proposed for inclusion in the renamed type "Nuts, seeds and saps" or to create a new type for the new group.

Position:

Kenya would like to thank the EWG led by USA and co-chaired by Netherlands for the work in elaborating the extensive classification of Food and Feed.

Kenya would like to offer the following proposal:

1. The change of the name of the Group 021 to be "**Plants for sugar or syrup production**".
2. We support the proposed Subgroup to be "**Grasses for sugar or syrup production**", but re-code the subgroup as 021A; which will include Sorgho or Sorghum, Sweet (stalk) and Sugarcane. We propose a corresponding change in the commodity codes to be **PSXXXX**. This would correspond to the proposed name of the Crop Group.

The Subgroup would be as follows:

Subgroup 021A: Grasses for sugar or syrup production:

- Representative commodity: Sugar cane or Sweet Sorghum
- Commodities: Sorgho or Sorghum, Sweet; Sugar cane

3. We propose the inclusion of a Subgroup 021B: "**Other plants for sugar or syrup production**"

The subgroup would be as follows:

Subgroup 021B: Other plants for sugar and syrup production:

- Stevia (*Stevia rebaudiana*)
- Sugarbeet. For this commodity, we propose to maintain the commodity codes as given in the Root and Tuber Vegetable Crop Group)

Rationale:

These are plants used in sugar production and are not grasses, and hence cannot be groups as grasses for sugar production. In this proposal, they are included in other plants that are important for the production of sugar and syrup.

4. We propose the inclusion of a new sub-group “**Sap-producing Trees**” as **Group 021C**.

This Sub-group would include items such as Maple Trees; and can provided a suitable commodity code.

This would also require the revision of the “Portion of the commodity to which the MRL applies (and which is analyzed) to incorporate sap, as portion of the commodity to which the MRL applies.

The Sub-group would be:

021C: Sap Producing Trees

- Maple tree

Rationale: The sap producing trees are an important commodity used in the production of syrup and hence should have a separate subgroup.

Uganda

Position: Uganda appreciates the work of the EWG, we would like to propose that the title of this group be amended to read, **Plants for sugar or syrup production**. This will incorporate other plant used in sugar production. We also suggest the creation of two sub-groups sap-producing trees (021B) and plants for sugar production (021C)

Rational: The change in the title will reflect all the commodities used in sugar and syrup production.

United States of America

The United States agrees with the outcome of the EWG that Group 021-- Grasses for sugar or syrup production should be maintained as currently established. The United States also agrees with the proposal to create a new separate group “Tree Sap Producers” and that it would be appropriate to include this group in a renamed Type 04 as “Nuts, Seeds and Saps.” In addition, the United States suggests that the “Portion of the commodity to which the MRL applies (and which is analysed)” for Group 021 should be “Whole commodity”.

African Union

Issue:

The 48th Session of CCPR agreed that the Electronic Working Group on the revision of the Classification chaired by the United States of America and co-chaired by the Netherlands would continue to work on Group 021 Grasses for Sugars or Syrup Production to look into the possible expansion and grouping of this Group including the possibility for multiple entries of commodities in different groups of the Classification and report back at the next session with a proposal for consideration. The Electronic Working group proposed to include a new group for “Tree Sap producers” and proposed for inclusion in the renamed type “Nuts, seeds and saps” or to create a new type for the new group.

Position:

AU proposes the following:

- i) to amend the name of the Group 021 to be “**Plants for sugar or syrup production**”.
- ii) supports the proposed subgroup grasses for sugar or syrup production, but re-code the subgroup as 021A; which will include Sorgo or Sorghum, Sweet (stalk) and Sugarcane. The commodity codes can be **PSXXXX**.
- iii) the inclusion of a new sub-group “**Sap-producing trees**” as Group 021B. This will include items such as maple trees; and provided a suitable commodity code. This would also require the revision of the “Portion of the commodity to which the MRL applies (and which is analyzed) to incorporate sap-producing trees.
- iv) inclusion of a new subgroup “**Plants for sugar production: as subgroup 021C**. This will include commodities such as Stevia, *Stevia rebaudiana*.

Rationale:

The change of name will enable inclusion of more commodities that are used in sugar and syrup production, which includes commodities that are traded internationally and may require maximum residue limits and not limited to grasses only.