



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

50th Session

Haikou, PR. China, 9 - 14 April 2017

Comments on Agenda Item 7(e) submitted by Australia, Canada, Chile, China, Egypt, European Union, Kenya and United States of America

**REVISION OF THE CLASSIFICATION OF FOOD AND FEED:
TABLE 4 – EXAMPLES OF REPRESENTATIVE COMMODITIES FOR
TYPE 04 – NUTS, SEEDS AND SAPS AND
TABLE 5 – EXAMPLES OF REPRESENTATIVE COMMODITIES FOR
TYPE 05 – HERBS AND SPICES**

Australia

Australia notes that the proposed representative crops to obtain a group CXL for Group 023 Oilseeds and oilfruits lists representative crops from Subgroup 023A Small seed oilseeds, Subgroup 023B Sunflower seeds, Subgroup 023C Cotton seed and Subgroup 023E Oil fruits. The GAP for oil fruits is unlikely to be consistent with the GAP for other oilseeds due to significant differences in crop structure, agronomic practices and likely pest pressures. The residues potential in oil fruit may also be significantly different to oilseeds. It is therefore considered to be unlikely that data to support a group MRL for 'Oilseeds and Oil fruits' would be available. An 'Oilseed' group not including oil fruits consisting of subgroup 023A, 023B, and 023C based on rapeseed, sunflower seed and cotton seed is suggested.

Canada

BACKGROUND

The revision of the commodity groups (e.g. fruit commodity groups, vegetable commodity groups, etc.) are retained until final completion of the related commodity groups and the corresponding tables on examples of representative commodities for inclusion in the Classification of Food and Feed and the Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups (CXG 84-2012) respectively.

Therefore, this item should be read in conjunction with Agenda Item 7(a) (CX/PR 18/50/6) and Agenda Item 7(b) (CX/PR 18/50/7) which is related to the revisions to the commodity groups for Types 04 and 05 of the Classification.

CURRENT STATUS

Table 4 and 5 in Appendices I and II of CX/PR 18/50/10 contain examples of representative commodities for Type 04 (Nuts, seeds and saps) and Type 05 (Herbs and Spices) at both the group and subgroup level. The commodities included in these groups/subgroups are also listed.

Members of CCPR are invited to submit comments regarding these two tables. With respect to Table 4 which lists the groups/subgroups in Type 04, in addition to commenting on the selection of representative crops, members are specifically asked to comment on whether Group 023D Other Oilseeds should be retained or if these commodities would be more appropriate in a miscellaneous group (refer to Agenda item 7(f)).

With respect to Table 5 which lists the groups/subgroups in Type 05, it is noted that additional commodities developed within the EWG have been added to the groups/subgroups. Comments on the inclusion of these additional commodities were requested under Agenda item 7(b).

In the context of representative commodities, through the work of the EWG, the following recommendations are proposed and members are asked to comment on them:

- For subgroup 027A Herbs (herbaceous plants):
 - Germany proposed that the representative commodities be “Basil **and** Mint or Leaf lettuce or Spinach”
 - CropLife International and the European Union proposed the representative commodities be “Basil **or** Mint or Leaf lettuce or Spinach”
- For subgroup 027B Leaves of Woody Plants:
 - Germany proposed the representative commodities be “Any commodity in this subgroup or Leaf Lettuce or Spinach”
- For subgroup 027C Edible Flowers:
 - Germany proposed the representative commodities be “Any commodity in this subgroup or Leaf Lettuce or Spinach”
- For subgroup 028A Spices, seeds:
 - CropLife International proposed the representative commodities be “Any commodity in this subgroup or Oilseed representative commodities”
- For subgroup 028B Spices, fruit or berry:
 - CropLife International proposed the representative commodities be “Any commodity in this subgroup or representative crops from subgroup Small fruits and berries”
- For subgroup 028C Spices, bark:
 - CropLife International proposed the representative commodities be “Any commodity in this subgroup or representative crops from Stalk and stem vegetables”
- For subgroup 028D Spices, root or rhizome:
 - The European Union proposed that the representative commodities be “Any commodity in this subgroup or any commodity in the Root and tuber vegetable group, applying an appropriate concentration factor”.
- For subgroup 028E Spices, buds:
 - CropLife International proposed the representative commodities be “Any commodity in this subgroup or broccoli / cauliflower”
- For subgroup 028F Flower or stigma:
 - CropLife International proposed the representative commodities be “Saffron or representative crops from Flowerhead Brassica”
- For subgroup 028G Spices, aril:
 - CropLife International proposed the representative commodities be “Mace or representative commodities from Tree nuts”
- For subgroup 028H Citrus Peel:
 - CropLife International proposed the representative commodities be “Any commodity in this subgroup or Citrus representative crops”

Canada’s Position on the groups/subgroups and representative commodities for Type 04 and Type 05 Classifications:

- As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the initial representative commodities for Type 04 and 05. However, it is noted that the changes to the representative commodities for the herbs and spices groups for which CCPR members are being asked to comment were not discussed/shared with the EWG prior to being presented at this session of Codex.
- Canada is in agreement with the proposed representative commodities for Type 4 (Nuts, seeds and saps). As to whether Group 023D Other Oilseeds should be retained or if these commodities would be more appropriate in a miscellaneous group, Canada’s position is summarized under the related Agenda item 7(f). For ease of reference it is also provided below:

Although Canada supports the use of both options for the classification system for commodities that do not meet the criteria for crop grouping, Canada is not opposed to creating a separate Type within each Class to provide a list of commodities and codes that do not meet the criteria for inclusion in a crop group (OPTION 1).

OPTION 1: create a separate Type within each Class to provide a list of commodities and codes that do not meet the criteria for inclusion in a crop group.

OPTION 2: create "Other" subgroups within a crop group.

- Canada's position on the additional commodities that have been added to the Type 5 Herbs and Spices is summarized under the related CCPR Agenda item 7(b). For ease of reference it is also provided below:

Canada is in agreement with the revisions to Group 027 Herbs and Group 028 Spices as described in Appendix I and II of CX/PR 18/50/7, with the following comments:

Canada is in agreement with the EU's proposal to relocate Subgroup 028H Citrus Peel and Subgroup 028I Dried Chili Peppers to Class D, Processed Foods of Plant Origin.

- Dried chilli peppers could be included in Group 056 Dried Vegetables.
- With regards to citrus peels, the dried peels could be included in Group 055 Dried Fruits.

Canada supports the location of Milk thistle and perilla seed in Subgroup 028A Seed Spices and not in the Oilseed group as this is consistent with the ICGCC's proposed location for these crops. Milk thistle and perilla seed should be removed from the revised Oilseed group given that the EWG has already determined that a commodity should only be included in one group or subgroup to avoid any possible confusion of having two different CXLs for the same commodity.

- With respect to the proposed changes to the representative commodities for the Herbs and Spices Groups, the table below summarizes the current representative commodities, any proposed changes to these commodities and Canadian's position on the proposed changes.

Codex Group / Subgroup	Examples of Representative Commodities ¹⁾	Alternative Examples of Representative Commodities	Canadian Position
Group 027 Herbs			
Subgroup 027A, Herbs (herbaceous plants)	Basil and Mint or Leaf lettuce or Spinach	Basil or Mint or Leaf lettuce or Spinach"	recommend "Mint and Basil or Leaf lettuce or Spinach" for subgroup 027A. Mint must always be required as it provides residue data for oil for commodities within this subgroup.
Subgroup 027B Leaves of woody plants	Any commodity in this subgroup or Leaf Lettuce or Spinach	Same	Support
Subgroup 027C Edible flowers	Any commodity in this subgroup or Leaf Lettuce or Spinach	Same	Do not support "or Leaf Lettuce or Spinach". All commodities in this group are flowers and the flower portion of the plant should be analyzed.
Group 028 Spices			
Subgroup 028A Spices, seeds	Any commodity in this subgroup	"Any commodity in this subgroup or Oilseed representative commodities"	Do not support "or Oilseed representative commodities"
Subgroup 028B Spices, fruit or berry	Any commodity in this subgroup	"Any commodity in this subgroup or representative crops from subgroup Small fruits and berries"	Do not support "or representative crops from subgroup small fruits and berries"

Codex Group / Subgroup	Examples of Representative Commodities ¹⁾	Alternative Examples of Representative Commodities	Canadian Position
Subgroup 028C Spices, bark	Any commodity in this subgroup	“Any commodity in this subgroup or representative crops from Stalk and stem vegetables”	Do not support “or representative crops from Stalk and stem vegetables”
Subgroup 028D Spices, root or rhizome	Any commodity in this subgroup or commodity from Root and Tuber Vegetables	“Any commodity in this subgroup or any commodity in the Root and tuber vegetable group, applying an appropriate concentration factor”.	Do not support “ or any commodity in the Root and tuber vegetable group, applying an appropriate concentration factor”.
Subgroup 028E Spices, buds	Any commodity in this subgroup	“Any commodity in this subgroup or broccoli / cauliflower”	Do not support “or broccoli / cauliflower”
Subgroup 028F Flower or stigma	Saffron	“Saffron or representative crops from Flowerhead Brassica”	Do not support “or representative crops from Flowerhead Brassica”
Subgroup 028G Spices, aril	Mace	“Mace or representative commodities from Tree nuts”	Do not support “or representative commodities from Tree nuts”
Subgroup 028H Citrus peel	Any commodity in this subgroup	“Any commodity in this subgroup or Citrus representative crops”	Being proposed to be moved to Class D Group 055 Dried Fruits (Agenda item 7(b))
Subgroup 028I Dried Chili Peppers	Any commodity in this subgroup	<u>No change</u>	Being proposed to be moved to Class D Group 056 Dried Vegetables (Agenda item 7(b))

¹⁾ Alternative representative commodities may be selected based on documented regional/country differences in dietary consumption and/or areas of production

General comment for all crop subgroups for which Canada does not support the additional representative crops from other crop groups:

The characteristics for crop grouping are:

- Commodity's similar potential for pesticide residues
- Similar morphology
- Similar production practices, growth habits, etc.
- Edible portion
- Similar GAP for pesticide uses
- Similar residue behavior
- To provide flexibility for setting (sub)group tolerances

These criteria are not expected to be the same for most of the representative crops from other groups as compared to the commodities within each of the spice subgroups. For example, the representative crops for oilseeds are rapeseed, sunflower seed, cotton seed and olives for oil production. These commodities do not have similar morphology, production practices or growth habits to spices such as basil or parsley and it is expected that they would have different residue profiles. Therefore, it is not appropriate to use representative crops from other crop groups for the spices group/subgroups.

Chile

I. General comments

Chile is grateful for the opportunity to respond to this Circular Letter on the Proposed Draft tables on examples of representative commodities for commodity groups under Type 04 and Type 05 (for inclusion in the Principles and Guidance on the Selection of Representative Commodities for the

Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups (CXG 84-2012), at Step 3.

In general, Chile supports the proposals of tables on representative examples, but requests to incorporate a product in the examples for extrapolation of Group 022, as outlined in the specific comments.

II. Specific comments

Chile requests the incorporation of Chilean hazelnut (*Gevuina avellana*) as one of the products listed in column 3, "extrapolation to the following commodities" of Group 022 Tree nuts:

Codex Group / Subgroup	Examples of Representative Commodities 1)	Extrapolation to the following commodities
Group 022 Tree Nuts	Two commodities from this group, except coconut	Tree nuts (TN 0085): African nut; Almond; Araucaria nut; Beech nut; Betel nut; Brazil nut; Butter nut; Canarium nut, Candle nut; Cashew nut; Chestnut; Coconut; Dika nut; Ginkgo; Hazelnut; Hickory nut; Japanese horse chestnut; Macadamia nut; Mongongo; Oak nut; Okari nut; Pachira nut; Pecan; Pequi seed; Pili nut; Pine nut; Pistachio nut; Sapucaia nut; Tropical almond; Walnut; Yellow-Horn; Chilean hazelnut (<i>Gevuina avellana</i>)

i. Rationale

Chile considers relevant to add **Chilean hazelnut**, since this species has a morphology, growth habit and edible part like the rest of commodities already considered for extrapolation of Group 022, as well as a similar potential for pesticide residues.

This species has an export potential of both its products and its by-products.

ii. General background on Chilean hazelnut.

- **Morphology:**

Avellana chilena (Chilean hazelnut), *Gevuina avellana* molina or also known as Gevuín Nefuén is a fruit of 1.5 cm in diameter, globose or slightly oval, its colour goes from green to purplish-black as it ripens, it has a woody shell which houses an oily seed.



Florachilena.cl

- **Growth habits:**

The tree that can reach 20 meters usually behaves like a shrub with elongated branches. Chilean hazelnut has perennial, imparipinnate, coriaceous and double serrated leaves of 14 to 35 cm long, without villi, of an intense and glossy green colour.



Florachilena.cl

- **Botanical description**

It has hermaphrodite, asymmetric and pedunculated flowers of 1 cm long, creamy white and are grouped into bunch-like flower clusters of 10 to 14 cm long.



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It belongs to the family *Proteaceae* the same to which macadamia nut (*macadamia sp*) belongs but it is of the genus *Gevuina*, being the only species in this genus and endemic to Chile.

- **Commercial Background**

It is a wild species from which its fruit is obtained and marketed as roasted hazelnut for direct use or in confectionery and pastry products, such as hazelnut flour and hazelnut oil; the latter has some importance as an export product.

Currently there are no commercial plantations and the products are obtained through collection, so there are not yet pesticides associated to this species.

- **Bibliography**

Veronica Loewe et al Monograph de Avellano Chileno Infor. 1997, 46p

Arturo Lavín Hazel Chilean Inia A 19p

China

1 China agrees to relocate commodities in Subgroup 023 D Other Oilseeds into Group 29 Miscellaneous, unclassified commodities, since Subgroup 023 D does not have a representative commodity and it is not possible to set a Group MRL for Subgroup 023 D. The same is true with commodities in 017C Subgroup of Other stalk and stem vegetables.

Egypt

Egypt agrees on the classification mentioned in Document no. CI 2018/15-PR related to :

Revision of the Classification Class A: Primary commodities of plant origin Type 04 – Nuts, seeds and saps

- Table 4 on examples of representative commodities for commodity groups under Type 04

Type 05: Herbs and Spices

- Table 5 on examples of representative commodities for commodity groups under Type 05

Egypt would like to provide the following comments Regarding Document no. CI 2018/15-PR:

Especially the Enquiry for the establishment of Group 023D Other Oilseeds, or if these commodities would be more appropriate for location in a miscellaneous group (Agenda Item 7(f), CX/PR 18/50/11):

Egypt recommends the establishment of Group 023D "other oilseeds"

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) 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 draft on the revision of the Codex Classification of Foods and Animal Feeds.

The EU acknowledges the work done by the eWG to harmonise and to check the internal coherence of various decisions taken by the CCPR in the period 2010-2017 on the revision of the classification of food and feed, in particular of the commodities of Type 4 and Type 5 and would like to submit the following comments:

On Appendix I of CX/PR 18/50/10. Table 4: Examples of the selection of representative commodities. Type 04 (Nuts, Seeds and Saps):

As regards the group 022, the proposed representative commodities in table 4 for the group of tree nuts give insufficient guidance to choose a suitable representative crop. It is therefore suggested to limit the choice as follows: 'two commodities from almonds, chestnuts, pecan, pistachios and walnuts'. The proposed specification 'except coconut' is strongly supported.

As regards group 023 (point 4 in CL 2018/15-PR) the EU strongly supports the inclusion of the footnote 2), which acknowledges the impossibility to set representative commodities and a group-CXL for this subgroup. As a consequence, group 023 in the first column could be named 'Oilseeds and oil fruits except oilseeds from **subgroup** (not group) 023D'. Please note that in case this exception was agreed, the commodity 'American oil palm **seed**' (not 'American oil palm **fruit**') would need to be deleted in the third column of table 4.

On Appendix II of CX/PR 18/50/10. Table 5: Examples of the selection of representative commodities. Type 05 (Herbs and Spices):

As regards the subgroup 027A 'Herbs', the EU suggests as representative commodities 'Basil **or** mint or leaf lettuce or spinach', instead of 'Basil **and** mint or leaf lettuce or spinach'.

As for subgroup 028D 'Spices, root or rhizome', the EU agrees with the examples of representative commodities, but when fresh root and tuber vegetables are considered, an appropriate drying factor needs to be applied. The suggested representative commodities will become as follow:

'Any commodity in this subgroup or any commodity from the Root and tuber vegetables group, applying an appropriate concentration factor.'

Since the tables presented under agenda item 7(e) must be considered in the light of the decisions taken under agenda items 7(a) and 7(b), the EU will not oppose to the advancement of tables 4 and 5 – Examples on the selection of the representatives commodities for Type 4 and Type 5, to CAC41 (2018) for final adoption.

Kenya

Position: Kenya supports examples of selection of the following representative crops;

Type 04 Nuts, Seeds and Saps

Group 022 Tree nuts, example of the representative crops, two commodities from this group except coconut

Group 023 Oilseeds and oilfruits, example of the representative crops, Rapeseed, Sunflower seed, Cotton seed and Olives for oil production

Subgroup 023A Small seed oilseeds example of the representative commodity, Rapeseed

Subgroup 023B Sunflower seeds, example of the representative commodity, Sunflower seed

Subgroup 023C Cotton seed, example of the representative commodity, Cotton seed

Subgroup 023E Oilfruits, example of the representative commodity, Olives for oil production

Group 024 Seeds for beverages and sweets, example of the representative commodity, Cacao bean and Coffee bean

Group 025 Tree saps, example of the representative commodity, any commodity in this subgroup

Type 05 Herbs and spices

Subgroup 027A, Herbs(herbaceous plants), example of the representative commodity, Basil and Mint or Leaf lettuce or Spinach

Subgroup 027B Leaves of woody plants, example of the representative commodity, any commodity in this subgroup or Leaf Lettuce or Spinach

Subgroup 027C Edible flowers, example of the representative commodity, any commodity in this subgroup or Leaf Lettuce or Spinach

Subgroup 028A Spices, seeds, example of the representative commodity, any commodity in this subgroup

Subgroup 028B Spices, fruit or berry, example of the representative commodity, any commodity in this subgroup

Subgroup 028C Spices, bark, example of the representative commodity, any commodity in this subgroup

Subgroup 028D Spices, root or rhizome, example of the representative commodity, any commodity in this subgroup or commodity from Root and Tuber Vegetables

Subgroup 028E Spices, buds, example of the representative commodity, any commodity in this subgroup

Subgroup 028F Flower or stigma, example of the representative commodity, Saffron

Subgroup 028G Spices, aril, example of the representative commodity, Mace

Subgroup 028H Citrus peel, example of the representative commodity, any commodity in this subgroup

Subgroup 028I example of the representative commodity, any commodity in this subgroup

Rationale: The selection of representative crops will facilitate the setting of group MRLs through extrapolation of the MRLs of the representative crops to the commodities in the group and/or subgroup.

United States of America

General Comments

In recent years, the Codex Committee on Pesticide Residues (CCPR) has agreed to revise all of the crop groups in the Food and Animal Feeds Classification. The request for comments in this CL covers a part of this ongoing effort. The United States has co-chaired or chaired the electronic Working Group from the start of this effort, has provided much of the documentation for the proposed crop groups, and strongly supports this project.

Specific Comments

The United States supports removing commodities from subgroup 023D (Other Oilseeds) and including the commodities in this subgroup in a separate type within the Class, which will provide a list of miscellaneous commodities that do not meet the criteria for crop grouping (see agenda item 7(f)). Commodities that have been previously placed in "Other" subgroups do not meet the criteria for crop grouping and do not have representative commodities.