

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6, 7a, 7b, 7c, 7e, 9

CRD 13

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

49th Session
Beijing, P.R. China, 24 - 29 April 2017

COMMENTS OF JAPAN

Agenda Item 6: “Draft and proposed draft maximum residue limits for pesticides in food and feed at Steps 7 and 4 (CX/PR 17/49/5)”

Japan would like to provide the following comments on the existing CXLs:

CXLs for Acephate (95) in tomato, and the proposed draft MRLs for Fluensulfone (265) in or on “komatsuma”, and for Fluazifop-P-butyl in or on cabbages, head and swede as follows:

Acephate (95)

– Tomato

The CXL for tomato at 1 mg/kg still in the list in CX/PR 17/49/05 and also in the Codex MRL database should have been deleted after the 28th Session of the Codex Alimentarius Commission in 2005. The report of the 38th Session of CCPR (ALINORM 05/28/24) in its para. 113 and Appendix VIII clearly indicate that the CCPR recommended the revocation of this CXL for tomato and, subsequently, the Codex Alimentarius Commission at the 28th Session agreed to the revocation (ALINORM 05/28/41, para. 89 and Appendix VII). This CXL seems to be inadvertently retained in the Codex MRL list and therefore it must be removed from the list and Codex database.

Fluensulfone (265)

– Komatsuma

The commodity name of VL 0481 in the document CX/PR 17/49/05, “Komatsuma”, must be amended to “Komatsu~~n~~a” (replacing the second “m” with “n”) in accordance with the agreement at the 44th Session of the CCPR (REP 12/PR, Appendix IX).

The term “Komatsuma” is originally Japanese name and the last part of the name, “na” usually means a leafy vegetable. The part “Komatsu” refers to the name of the place in the current Tokyo where it is originated. Komatsuma is a Brassica leafy vegetable and quite commonly consumed in Japan. Komatsuma has already been included in the Codex Classification of Foods and Animal Feeds published in 1993 but there the name is misspelled with the “ma” instead of “na”. In the draft revised Classification, it is typed correctly.

Agenda Item 7a: “Draft and Proposed Revision of the Classification of Food and Feed at step 7 and 4: Vegetable Commodity Groups”

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the draft and proposed revision of the Codex Classification for vegetable commodity groups (CX/PR 17/49/6). Japan would like to provide the following comments:

Comments on draft revision of all the commodity groups in Type 02 Vegetables

Japan supports the advancement of all the revised vegetable commodity groups as presented in Appendix II to Step 8 provided that the following editorial amendments are reflected:

- Cucuzzi, see Bottle gourd, VC 0422~~F~~
- Spiny bitter gourd, see Gac, V~~CR~~ 2654
- Sweet gourd, see Gac, V~~CR~~ 2654
- Tree tomato, see Group 06 Assorted tropical and sub-tropical fruits – inedible peel , F~~H~~ 0312

VL 0480 Kale

(including among others: Collards, Curly kale, Scotch kale, Thousand-headed kale, Branching bush kale, Jersey kale; not including Marrow-stem kale, no. AV 1052, see Group 052: Miscellaneous fodder and forage crops, ~~page 108~~)

- **Sunchae**, see Water shield, VL 28210

VP 0062 Beans without pods (*Phaseolus* spp.) (succulent seeds) ~~VP 2843~~

- **Black-eyed pea**, see Cowpea (dry), VD 05276
- **Kötak**, see Taro, VR 05050
- **Ufi**, see Yams, VR 06600
- **Paddy straw mushroom**, see Straw mushroom, VF 30659

The description of some commodities in Table 1 of Appendix III (overview of moving vegetable-commodities with their involved subgroup-CXLs) should be corrected as follows:

Existing classification			Revised classification		
Commodity	Group CXL	Subgroup CXL	Commodity	Group CXL	Subgroup CXL
VO 04407 Sweet corn (corn on the cob)	VO 0050 Fruiting vegetables, other than cucurbits	-	Sweet corn (corn- on-the-cob) (kernels plus cob with husk removed) (code not yet decided)	GC 0080 Cereal grains	GC 2090 Sweet corns
VO 1275 Sweet corn (kernels)	VO 0050 Fruiting vegetables, other than cucurbits	-	Sweet corn (whole kernel without cob or husk) (corn-on- the-cob) (code not yet decided)	GC 0080 Cereal grains	GC 2090 Sweet corns
VR 05862 Galangal, Lesser	VR 0075 Root and tuber vegetables	-	HS 0783 Galangal, rhizomes	HS 0093 Spices	HS 0193 Spices, root or rhizome*

Comments on the proposal to add the description of all subgroups the words “subgroup of”

It is appropriate to retain the current code numbers and common names of the (sub)groups and individual commodities for the following reasons:

- The current code numbers and common names are sufficient to avoid misinterpretation. For example, while a single individual commodity is described in the singular form (e.g. peach), the (sub)group that includes this commodity is described in the plural form (e.g. peaches). Separate code numbers are allocated to the former (e.g. FS 0247) and the latter (e.g. FS 2001); and
- It is necessary to ensure consistency with the six commodity groups of Fruits for which the revised classification has already been adopted by the Commission in 2012, which do not include the term “subgroup of” for the description of subgroups.

Agenda Item 7b: “Draft revision of the Classification of Food and Feed at Step 7: Selected commodity groups (Group 020 – Grasses of cereal grains)”

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the draft and proposed revision of the Codex Classification for Group 020 Cereal grains (CL 2017/19-PR Rev). Japan would like to provide the following comments:

Comments on canarygrass

Japan supports the proposal by Canada to place Canarygrass in Subgroup 020B Barley, similar grains, and pseudocereals with husks because canarygrass is similar to barley in that the husks remain attached to kernels during threshing.

Comments on maize, sorghum and sweet corn

It is appropriate to include sweet corn and maize into different subgroups as sweet corn is harvested immature at the milk stage, while maize is harvested mature (dry) at the full ripe stage (as previously shown in CRD 8 at the 47th Session of the CCPR). It should be noted that “the Committee noted general agreement that sweet corn (filed corn) would be included under a separate sub-group” at the 47th Session of the CCPR (REP 15/PR, para. 132).”

However, as a compromise, it could be acceptable to transfer all the commodities in the Subgroup 020E Sweet Corns into the Subgroup 020D Maize, Grain Sorghum and Millet for the following reasons:

- i. While sweet corn and maize are harvested at the different growth stages of corn, they are similar in that their kernels plus cobs are protected by husks from pesticides sprayed throughout growing season. Because of this, concentrations of pesticide residues in sweet corn (kernels), sweet corn (corn-on-the-cob) (kernels plus cob with husk removed) and maize (kernels) are generally low and;
- ii. According to the Codex MRLs database (accessed on January 10, 2017), majority of CXLs for both sweet corn and maize are established at or about the LOQ. The ratio of CXLs with finite values to all the CXLs for maize (20/45) are higher than that for sweet corn (corn-on-the cob) (12/32). The concentration of water in maize kernels (14.5%) is much lower than that of sweet corn kernels (77.1%) or baby corn (90.9%). These facts indicate that pesticide residues in mature corn may cover the residues in immature corn.

Transfer of Maize from Subgroup 020D Maize, Grain Sorghum and Millet to Subgroup 020E Sweet corns may not be consistent with the current practice of the revision of Codex Classification because the production volume and consumption volume of maize are much larger than those of sweet corn or baby corn.

In view of the analysis of residue data on maize and sorghum provided by Australia, sorghum may be added as examples of representative commodities of Subgroup 020D Maize, Grain Sorghum and Millet, regardless of the location of the above mentioned commodities.

Agenda Item 7c: “Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 021 - Grasses for sugars or syrup production)”

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the draft and proposed revision of the Codex Classification for Group 021 Grasses for sugars or syrup production (CL 2017/20-PR). Japan would like to provide the following comments:

Comments on tree saps

It is necessary for the Committee to consider the following information in determining the appropriate commodity group for edible and sweet tree saps:

- i. The portion of the commodity in trade; tree saps as harvested (raw agricultural commodities) or condensed (processed commodities);
- ii. The portion of the commodity to which the MRL applies (and which is analyzed); tree saps as harvested (raw agricultural commodities) or condensed (processed commodities); and
- iii. Feasibility of enforcing the MRLs for these commodities at the port of entry in member countries.

Provided that enough information on the above points is made available to justify the inclusion of tree sap in “CLASS A PRIMARY FOOD COMMODITIES OF PLANT ORIGIN,” Japan supports the proposal to maintain Group 021 Grasses for sugar or syrup production as currently established and to create a new group for tree sap.

As tree sap does not belong to grass family, it is necessary to create a new “Group” for tree sap, which needs to be placed under a new “Type” or one of the existing Type other than Type 03 Grasses. If this new group is to be included in Type 04 “Nuts and Seeds”, the name of this Type should be amended as “**Nuts/Seeds and saps**” in view of the large difference in forms between saps and other commodities including nuts and seeds.

Comments on the Portion of the commodity to which the MRL applies (and which is analyzed)

Japan proposes the following text for insertion in *the Portion of the commodity to which the MRL applies (and which is analyzed)* for Group 021:

“Whole commodity. Sorgo or Sorghum, Sweet : Stalk. Sugar cane : cane. ”

Regardless of whether or not to expand this group from only grasses to other plants, it appropriate to establish MRLs for and analyze “Whole commodity” as traded. Clarification of “whole commodity” would be helpful to the users of Codex Classification. According to the OECD Test Guidelines No. 509 on Crop Field Trial, the “whole commodity” is defined as stalk for sweet sorghum, and cane for sugar cane, respectively.

In the above text are included, it is not necessary to add the term “(stalk)” as an descriptor for GC 0658 Sorgo or Sorghum, Sweet.

Agenda Item 7e: “Proposed draft Tables - Examples of selection of representative commodities (vegetable and other commodity groups) (for inclusion in the Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides to commodity groups) at Step 4”

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the proposed draft tables 2 and 3 (CL 2017/22-PR). Japan would like to provide the following comments:

Comments on draft Table 2 on Examples of the selection of Representative Commodities - Vegetables

The common names and code numbers listed in Tables 2 should be amended as necessary to ensure consistency with the corresponding names and numbers as agreed in the discussion of revision of Codex Classification of Foods and Animal Feeds under agenda items 7a.

Japan supports the inclusion of Table 2 in the “Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups (CAC/GL 84-2012)” as presented in Appendix II provided that the following editorial amendments are reflected:

- The title of should read **“TABLE 2. EXAMPLES OF THE SELECTION OF REPRESENTATIVE COMMODITIES, TYPE 02 VEGETABLES”** in order to ensure consistency with Table 1 in CAC/GL 84-2012;
- It is necessary to **delete** the term **“Beet, garden leaves”** in the columns of “Examples of Representative Commodities” in both “Group 013 Leafy vegetables (including Brassica leafy vegetables)” and “Group 013C, Leaves of root and tuber vegetables.” This commodity is not included in the Group 013 (see CX/PR 17/49/06, Appendix II);
- The term **“Witloof”** should be amended as **“Witloof chicory (sprouts)”** in the columns of “Extrapolation to the following commodities” in “Group 13F, Witloof”;
- The code number **“VP 2063”** should be replaced with **“VP 2064”** for “Succulent peas without pods” in the columns of “Extrapolation to the following commodities” in “Subgroup 14D, Succulent peas without pods”;
- The code number **“VP 2064”** should be replaced with **“VP 2065”** for “underground beans and peas” in the columns of “Extrapolation to the following commodities” in “Subgroup 14E, Underground beans and peas”;
- The code number **“VD 2065”** should be replaced with **“VD 2066”** for “Dry beans” in the columns of “Extrapolation to the following commodities” in “Subgroup 15A, Dry beans”;
- The code number **“VD 2066”** should be replaced with **“VD 2067”** for “Dry peas” in the columns of “Extrapolation to the following commodities” in “Subgroup 15B, Dry peas”; and
- The common name and its code number **“Dry underground legumes (VD 2067)”** should be replaced with **“Dry underground pulses (VD 2068)”** in the columns of “Extrapolation to the following commodities” in “Subgroup 15C, Dry underground pulses.”

Comments on proposed draft Table 3 on Examples of the selection of Representative Commodities - Grasses

The names of commodities and subgroups in Tables 3 should be amended as necessary to ensure consistency with the corresponding names as agreed in the discussion of revision of Codex Classification of Foods and Animal Feeds under agenda items 7b and 7c.

Agenda Item 9: “Discussion paper on the possible revision of the IESTI equations (CX/PR 17/49/12)”

Japan appreciates the efforts of the Netherlands and Australia in leading the electronic working group (eWG) for preparing the draft discussion paper. Japan would like to provide the following comments.

To facilitate the discussion in CCPR and increase the transparency, all the comments submitted by eWG members during the work of the eWG should be made available to all members coming to CCPR, in particular those not having participated in the eWG.

The current IESTI equations should be scientifically evaluated by an expert consultation organized by FAO/WHO to determine a need for revisiting, prior to impact analysis changes of the equation by CCPR. For the expert consultation, pending the available funding, the terms of reference should be prepared by the CCPR.

The variability factor of 3 used in the current IESTI equations was determined on a basis of an extensive data set of residue concentrations in units of various crops. If as proposed above, the expert consultation is to evaluate the equations scientifically, the appropriateness of variability factor should also be considered although it is of lower priority.

If the expert consultation recommends to change the equations, then, impact caused by such changes, e.g., loss of Codex MRLs, should be examined by comparing two IESTI values for each Case of short-term intake estimation, for the purpose of establishing Codex MRLs: one IESTI value derived from the current equation used by the JMPR, and the other IESTI value from a new equation.