



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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COMMENTS on 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, submitted by Australia, Canada, Chile, Ecuador, European Union, Ghana, Kenya, Uganda, United States of America, African Union

Australia

Australia wishes to thank the EWG for their work to review the Classification.

Australia considers commodities within a crop group or sub-group should exhibit "similar" residue potential to encourage the recommendation of group MRLs. It is evident from discussions at CCPR that MRLs can be held back in the Step process or even not supported unless the members have confidence that this is the case.

The JMPR has implemented a protocol for assessing group MRLs, identifying the major crop commodity in the group expected to have the highest residues and also the crop commodity expected to have the lowest residues. In this protocol residues are deemed not too dissimilar if the ratio of the medians of the residues for the different commodities is less than 5.

Australia is of the opinion that in some cases representative commodities have been proposed without sufficient consideration of their practicality for estimating group MRLs.

As emphasised in CL 2017/22-PR, the characteristics for crop grouping are:

1. Commodity's similar potential for pesticide residues;
2. Similar morphology;
3. Similar production practices, growth habits, etc;
4. Edible portion;
5. Similar GAP for pesticide uses;
6. Similar residue behavior;
7. To provide flexibility for setting (sub) group tolerances.

In developing the following comments, use was made on the JMPR monographs to assess the relative residue potential of the different commodities. Following the approach of the JMPR for a crop group, the key information required are a dataset of residues used to estimate the maximum residue level and an estimate of the range of residues (residues in commodity with lowest residues compared to the commodity with the highest residues) to determine if there can be confidence that residues in the individual commodities are not too different.

With the thought process implemented by JMPR in mind, simplification of the representative commodities is possible.

Comments on Table 2

Group	Examples of Representative Commodities	Comment
Group 009 Bulb vegetables	bulb onion AND {spring onion OR leek} Suggest: bulb onion AND spring onion	Based on a review of JMPR, expected residues are: spring onion>leek>>bulb onion. A group could be set using spring onion AND bulb onion trials. Use of leek might lead to an MRL that is too low to accommodate spring onion. Bulb onion is required to ensure a group is appropriate, i.e. residues are not too dissimilar
Subgroup 009B, Green Onions	spring onion OR leek Suggest: Spring onion	Based on a review of JMPR, expected residues are: spring onion>leek
Group 010 Brassica (cole or cabbage) vegetables, head cabbages, Flowerhead cabbages	Broccoli (Could be partly replaced by Cauliflower) AND {Cabbage, Head OR Chinese cabbage (type Pe-tsai)} AND Brussels sprouts AND Kohlrabi Suggest: Broccoli OR Kohlrabi AND Cabbage AND Cauliflower	Based on a review of JMPR, expected residues are: Broccoli≈Kohlrabi>cabbage (with wrapper leaves) ≈Brussels sprouts>cauliflower. A group could be set using Broccoli OR Kohlrabi AND cauliflower trials. Broccoli or kohlrabi to determine the highest residues. Cauliflower is required to ensure a group is appropriate, i.e. residues are not too dissimilar. NOTE: JMPR 2015 and 2016 use cabbages (with wrapper leaves) AND broccoli.
Group 010B, Head Brassicas	{Cabbage, Head OR Chinese cabbage (type Pe-tsai)} AND Brussels sprouts Suggest: Cabbage, Head OR Chinese cabbage (type Pe-tsai)	Based on a review of JMPR, expected residues are: Cabbage (with wrapper leaves) are usually higher than Brussels sprouts, but the levels are not too different
Group 11 Fruiting vegetables, Cucurbits	Cucumber AND Squash, Summer AND/OR gourd AND Melon (<i>Cucumis melo</i>) AND/OR Watermelon Suggest: Melon (<i>Cucumis melo</i>) AND Cucumber AND Summer squash	Based on a review of JMPR, expected residues are: Melon≈Summer squash≥cucumber≥watermelon. Melon AND Summer squash to determine the highest residues. Cucumber is required to ensure a group is appropriate, i.e. residues are not too dissimilar. NOTE: JMPR 2015 and 2016 use melon AND cucumber AND summer squash

Group	Examples of Representative Commodities	Comment
Subgroup 11A, Fruiting vegetables, Cucurbits - Cucumber and Summer squashes	Cucumber AND Squash, Summer AND/OR gourd Suggest: Cucumber AND Squash, Summer	In a study on residues in cucumber, bitter gourd and zucchini following application at the same rate, residues of acephate, methamidophos, metalaxyl, imidacloprid and thiacloprid were similar. Eun H et al (2005) Food Crop Grouping for Setting Maximum Residue Limits (MRLs) and Facilitating Availability of Pesticides for Minor Crop Uses—Cucurbit Vegetables Group. J Pest Sci 30:145-152 https://www.jstage.jst.go.jp/article/jpestics/30/2/30_30_145/article NOTE: JMPR 2015 and 2016 use cucumber AND summer squash
Subgroup 11B Fruiting vegetable, Cucurbits such as melons, pumpkins and winter squashes	Melon (<i>Cucumis melo</i>) AND/OR watermelon Suggest: Melon (<i>Cucumis melo</i>)	Melons with rough skin have higher residues than watermelon. Melon is the critical commodity for estimating MRLs. Residues in watermelon are comparable but lower than melon.
Group 012 Fruiting vegetables, other than Cucurbits	One cultivar of large variety Tomato AND one cultivar of small variety Tomato AND Sweet Pepper AND Chili pepper AND {One cultivar of large variety eggplant AND/OR tomato} AND {one cultivar of small variety eggplant AND/OR tomato} Suggest: One cultivar of large variety Tomato AND one cultivar of small variety Tomato AND Sweet Pepper AND Chili pepper	Based on a review of JMPR, expected residues are: chili > pepper>tomato ≈ eggplant The representative crops recognise that eggplant residues are similar to tomato residues so the requirement for eggplant is redundant A group could be set using tomato (small and larger) AND pepper (sweet and chili) trials. NOTE: JMPR 2015 and 2016 use tomato AND pepper (sweet and chili)

Group	Examples of Representative Commodities	Comment
Group 013 Leafy vegetables (including Brassica leafy vegetables)	{Head lettuce AND/OR Leaf lettuce} AND Spinach AND {Mustard greens OR Kale OR Broccoli, Chinese OR radish leaves} AND Beet, garden leaves AND {Sweet potato leaves OR Arrowroot leaves} AND Grape leaves AND {Kangkung OR Water mimosa OR Watercress} AND Witloof chicory (sprouts) AND {Chayote leaves OR Pumpkin leaves} AND {Leaf lettuce OR any crop intended to use as baby leaves (harvested up to 8 true leaf stage)} AND Mungbean sprouts	The range of commodities is too great for a group MRL to be set. The use patterns are likely to be the same for sub-groups 013A and 013B but are expected to differ substantially for the other subgroups. This higher level group as is proposed is not useful and certainly it is unlikely to get trials in all the commodities connected by an 'AND'. The inclusion of so many different subgroups, that may not have similar production practices, growth habits or GAPs for pesticide treatments, may prevent the establishment of a higher level group MRL for 'leafy vegetables'.
Group 013A, Leafy greens	{Head lettuce AND/OR Leaf lettuce} AND spinach Suggest: Head lettuce AND spinach	Based on a review of JMPR, expected residues are: spinach ≥ chard > leaf lettuce > head lettuce ≈ endive Spinach residues would drive the MRL with head lettuce required to ensure the residues are not too dissimilar for the group NOTE: JMPR 2015 and 2016 use lettuce AND spinach
Group 013B, Brassica leafy vegetables	{Mustard greens OR Kale OR Broccoli, Chinese, OR radish leaves} Suggest: mustard greens	Based on a review of JMPR, expected residues are: mustard greens ≈ radish tops > kale Suggest Mustard greens would be sufficient NOTE: JMPR 2015 and 2016 use mustard greens

Group	Examples of Representative Commodities	Comment
Group 15 Pulses	{Beans, dry (<i>Phaseolus</i> spp.) AND/OR Peas, dry (<i>Pisum</i> spp.)} AND Soya bean, dry AND Bambara groundnut Suggest: {Beans, dry (<i>Phaseolus</i> spp.) AND/OR Peas, dry (<i>Pisum</i> spp.)} AND Soya bean, dry	Bambara groundnut has a completely different cultivation practice/growth habit compared to beans, peas and soyabeans. It is unlikely trials will be available for Bambara groundnut. A pragmatic solution would be to not require trials for this crop. This approach would be consistent with that taken for Group 14 Legume vegetables. NOTE: JMPR use beans dry AND peas dry AND soya beans
Group 17 Stalk and stem vegetables	Celery AND {Asparagus AND/OR Artichoke, globe} Suggest: Celery AND Asparagus	It is unlikely that the use patterns would be the same for these crops. Additionally residues in celery are typically higher than globe artichoke with lowest residues in asparagus Suggest Celery AND asparagus

Australia has proposed revised groups covering maize, sorghum and millet (refer to comments submitted in response to CL 2017/19-PR). Based on the expected residues for sorghum grain and millet compared to maize, it is not appropriate for maize to be a representative commodity for sorghum grain or vice versa. For example, a CXL for sorghum grain extrapolated from residue data for maize would likely be about 1/50th of the level required to accommodate expected residues in sorghum grain. The comments in the table below are suggestions that apply if the committee agrees to the revised groups proposed by Australia.

Comments on Table 3

Group	Examples of Representative Commodities	Comment
Subgroup 020D Grain Sorghum and Millet	Sorghum grain	Residues in other crops in the group are expected to be similar to sorghum
Subgroup 020E Maize Cereals	Maize	Residues in other crops in the group are expected to be similar to maize
Subgroup 020F Sweet Corn Cereals	Sweet corn (Corn-on-the-cob) (kernels plus cob with husk removed)	Residues in other crops in the group are expected to be similar to sweet corn

Canada

Background:

- Discussion on the vegetable commodity groups was completed at the 48th Session of CCPR (April 2016). The EWG on the revisions of the Classifications was requested to compile all vegetable commodity groups finalized by CCPR to ensure consistency throughout the groups in order to send the entire vegetable commodity group to CAC40 (2017) for final adoption.
- The EWG was also requested to check and finalize Table 2 on the examples of representative commodities for vegetable commodity groups taking into account the vegetable commodity groups as finalized by CCPR. The EWG was also requested to continue work on Table 3, Type 03 Grasses.
- The process for the revision of the Classification is to retain the revision of the commodity groups (eg vegetable) awaiting final compilation 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. Therefore this agenda item should be read in conjunction with Agenda item 7(a) as per the finalization of the vegetable commodity group.

Current Status:

- There was consensus by the EWG that chia should be a member of Group 020 rather than as previously proposed in Herbs and Spices (Group 028A Seeds HS 3283 at Step 7)
- EWG was also in agreement that separate codes were needed for commodities in Subgroup 020E Sweet Corn.
- The EWG continued work on Table 3 Examples of the Selection of Representative Commodities – Grasses

For the Grasses group, the location of canary grass and maize in the subgroups is still under discussion and there is a recommendation to use grain sorghum as an example alternative representative commodity for Subgroup 020D Maize, Grain Sorghum and Millet.

Request to CCPR49:

CCPR49 has been asked to comment on Table 2 (Examples of the Selection of Representative Commodities – Vegetables) and to fully support agreement on Table 2 and to send both the entire vegetable commodity groups and Table 2 to CAC40 (2017) for final adoption and inclusion in the Classification of Food and Feed and the Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides to commodity groups respectively.

CCPR49 has been asked to comment on Table 3 (Examples of the Selection of Representative Commodities – Grasses) in particular as to the location of canarygrass, maize and the potential use of grain sorghum as an example alternative representative commodity for Subgroup 020D Maize, Grain Sorghum and Millet.

Canada's Position on the proposed draft tables on examples of representative commodities (vegetable and other commodity groups)

- As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the representative commodities for the vegetable and other commodity groups.
- Canada fully supports Table 2 Examples of the Selection of Representative commodities – Vegetables and is in agreement to send both the entire vegetable commodity groups and Table 2 to CAC40 for final adoption.
- Canada supports the location of canarygrass in Subgroup 020B, Barley, similar grains, and pseudocereals with husks. Please refer to Canada's comments on CL 2017/19-PR for the rationale.
- Canada supports the location of maize in Subgroup 020E with sweet corn. The subgroup will need to be renamed accordingly. Please refer to Canada's comments on CL 2017/19-PR for the rationale.
- Canada supports the use of grain sorghum as an example representative commodity for Subgroup 020D Maize, Grain Sorghum and Millet. As Australia has previously indicated, residues in grain sorghum are often significantly higher than in maize.
 - Furthermore, if a consensus is reached by the EWG to group maize with sweet corn, Subgroup 020D would require its own example representative commodity. Currently the example representative commodity for Subgroup 020D is maize, only.

Chile**I. General Comments:**

Chile appreciates the work done by the electronic working Group led by the United States of America and co-chaired by the Netherlands.

II. Specific comments

Comment 1. Concerning Appendix II (for comments), 1.1 Table 2. Examples of the Selection of Representative Commodities – Vegetables, it is proposed the following modification in column 3, Group 013:

Codex Group / Subgroup	Examples of Representative Commodities 1)	Extrapolation to the following commodities
Group 013 Leafy vegetables (including Brassica leafy vegetables)	"Head lettuce and/or Leaf lettuce and Spinach.."	...; ruca (rúcula) [<i>rucola</i>];...
Group 013B, Brassica leafy vegetables	Mustard greens or Kale or Broccoli, Chinese, or radish leaves	Leaves of Brassicaceae (VL 0054): ; ruca (rúcula) [<i>rucola</i>]; rutabaga greens; ...

Rationale:

Ruca or rúcula [*rucola*] appears in the row of the group with the name “rúcula” and in the Subgroup 013B as “ruca”; considering that this vegetable is known by both names, it is suggested to homologate the table leaving both in the group and in the subgroup the same terminology: ruca (rúcula).

Comment 2. Concerning Appendix II (for comments), 1.1 Table 2. Examples of the Selection of Representative Commodities – Vegetables, it is proposed the following modification in column 2, Subgroup 013:

Codex Group / Subgroup	Examples of Representative Commodities 1)	Extrapolation to the following commodities
Subgroup 15B Dry peas	Peas, dry (<i>Pisum</i> spp.) and/or beans dry (<i>Phaseolus</i> spp.)	<u>Dry peas (VD 2066)</u> : Peas (<i>Pisum</i> spp.); Chick-pea; Field pea; Grass-pea; Lentil; Pigeon pea

Rationale:

It is proposed to delete “beans” as an example of representative commodity, since this subgroup is for species of the genus *Pisum*.

Ecuador

Ecuador thanks the United States of America and the Netherlands for the work carried out by electronic means on the Proposed draft Tables on examples of representative commodities (vegetables and other commodity groups) (to be incorporated 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.

After analysing the document (CL 2017/22-PR), Ecuador has no comments on the proposed example of representative commodity and supports to continue with the work that is being performed.

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 draft and proposed revision of the Classification of Foods and Animal Feeds.

The European Union (EU) would like to submit the following comments to the document CL/2017/22-PR.

The EU agrees with the proposed Table 2: “Examples of the Selection of Representative Commodities – Vegetables” and fully supports its final adoption by CAC40 (2017).

The EU could support the proposed Table 3 “Examples of the Selection of Representative Commodities – Grasses”, with the amendments which will become necessary in case the proposed moves of canarygrass (from the subgroup 020D to the subgroup 020B) and of maize, popcorn and teosinte (from the subgroup 020D to the subgroup 020E) will be accepted (see also comments to the point 7(b)).

In particular:

- in the first column ‘Codex group/Subgroup’, the names of the subgroups 020D and 020E should be amended as follows:

- Subgroup 020D “Grain sorghum and Millet”;
- Subgroup 020E “Maize and Sweet corn cereals”;

- in the second column ‘Examples of representative commodities’:

- the representative commodity for the subgroup 020D should become “Sorghum, grain”. The commodity “Maize” should be deleted;

- in the third column ‘Extrapolation to the following commodities’:

- the commodity “canarygrass, annual” should be deleted from the subgroup 020D and added to the subgroup 020B;
- the commodities “Maize”, “Popcorn” and “Teosinte” should be deleted from the subgroup 020D and added to the subgroup 020E.

In addition, in case the move of maize, popcorn and teosinte into subgroup 020E will be agreed the EU considers necessary to add maize as representative commodity of the subgroup 020E. The representative commodities for the group 020E should become: “*Maize and Sweet corn (corn-on-the-cob)*”.

Ghana

Ghana supports the advancements made on this class and requests the addition of the **Commodity Shallot to Group 009A, Bulb onions with Code number is VA 0388**

Kenya

Position: In view of the additional proposals made with respect to Group 021 and 024, we propose the incorporation of the proposed commodities included in the Table.

Rationale:

Since the Crop Groups 021 and 024 have new proposals, these proposals should be incorporated and representative commodities included in the proposed Tables.

Uganda

Position: Uganda appreciates the enormous work that has been put over the years to come up with examples of selection of representative commodities. We agree with the representative groups 009 to 20.

However, we note that consideration should be given for more work on group 21.

Rational: This is in line with our previous positions in supporting the use the following key principle in the selection of representative crops; a representative crop commodity is likely to contain the highest residue

United States of America

The United States fully supports Table 2: Examples of the Selection of Representative Commodities – Vegetables, and agrees that Table 2 and the entire vegetable commodity groups be advanced to the Codex Alimentarius Commission (CAC) for final adoption in July 2017 and included in the Classification of Food and Feeds, as well as The Principles and Guidance for the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups. In regards to Table 3: Examples of the Selection of Representative Commodities – Grasses, the United States supports the inclusion of Grain sorghum as an example of an alternative representative commodity for Subgroup 020D Maize, Grain Sorghum and Millet.

African Union

Issue:

During the 48th Session of the CCPR, the committee agreed to hold the tables at Step 2/3 for further discussion, comments and consideration at its 49th Session.

Position:

AU concurs with the proposals for the representative crops for the following groups:

- Group 009: Bulb vegetables
- Group 010: Brassica vegetables except brassica leafy vegetables
- Group 11: Fruiting vegetables cucurbits
- Group 12: Fruiting vegetables other than cucurbits
- Group 13: Leafy vegetables including brassica leafy vegetables
- Group 14: Legume vegetables
- Group 15: Pulses
- Group 16: Root and tuber vegetables
- Group 17: Stalk and stem vegetables
- Group 18: Edible fungi
- Group 20: Cereal grains

However, AU does not support the proposal made for Group 21 since more work needs to be done to finalize the proposed Group.