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Agenda Item 7(c)

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

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REVISION OF THE CLASSIFICATION OF FOOD AND FEED: TRANSFER OF COMMODITIES FROM CLASS D – PROCESSED FOOD COMMODITIES OF PLANT ORIGIN TO CLASS C – PRIMARY ANIMAL FEED COMMODITIES

Comments submitted in reply to CL 2019/19-PR
by Canada, Egypt and Ghana

Canada

BACKGROUND

- At CCPR50, it was agreed that all feed commodities should be grouped under the agreed new structure for Class C (Primary Feed Commodities) / Type 11 (Primary feed commodities of plant origin). Therefore processed commodities identified as feed under Class D should be transferred to Class C.
- The EWG on the revision of the Classification for Class C (Primary Feed Commodities) and Class D (Processed Food of Plant Origin) discussed the processed commodities under Class D that could either be consumed as feed and/or food and could therefore be transferred to Class C or be retained in Class D taking into account: (i) the Terms of Reference of the EWG for the revision of Class C and Class D and the potential relocation of processed commodities from Class D to Class C; and (ii) the decision taken by CCPR50 on the approach to the revision of the Classification to include a commodity only in one group or subgroup to avoid confusion of having two different CXLs for the same commodity.
- The proposal of the EWG to transfer processed commodities to the group of animal feed (from Class D to Class C) is based on the classification in OECD Guidance Document on Residues in Livestock and input of the members of the EWG.
- For cases where the commodity has dual purpose as a food and feed, CCPR50 agreed that a commodity can have only one entrance in the Classification. The EWG therefore agreed with the premise that a commodity that is used as food, cannot be included in the group of feed. Also when only a small part of the total quantity of a product is used as food and most of it is intended as animal feed, then commodity will be included in processed food commodities and not classified as a feed commodity.

CCPR50 (2018) also agreed to:

- align the structure of Class C based on the water content of feeds (high water content versus low water content) so as to facilitate crop grouping and extrapolation of maximum residue limits (MRLs) and
- group all feed commodities under Class C and consequently transfer processed feed commodities from Class D (Processed Food Commodities of Plant Origin) to Class C (Primary Animal Feed Commodities).

CURRENT STATUS

The proposed revised Class C is summarized in Appendix 1 of CX/PR 19/51/8. The revised Type 11 includes an additional subgroup for processed products and additional commodities have been added to groups 50, 51, and 52.

Canada has proposed separating out grasses from cereal grains due to the difficulty in identifying appropriate representative commodities. Grasses could be separated into warm season and cool season grasses.

Members of CCPR are invited to consider the relocation of processed commodities from Class D and Class C in order to have a single Class C grouping of all feed commodities. Such consideration should take into account the conclusions and recommendations in relation to the revision of Class C and Class D in the relevant working documents under Agenda Items 7(a) and 7(b). Particular attention should be paid to those processed commodities that are proposed to be moved from Class D to Class C – Subgroup 052C (Processed products, such as meal, hulls, dried pulp, molasses)

Canada's Position on the transfer of commodities from Class D to Class C

- As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the revisions to Class C, specifically in relation to the relocation of animal processed commodities from Class D (Processed Food Commodities of Plant Origin) to Class C.
- Canada is in agreement with the processed commodities that are recommended by the EWG to be transferred from Class D to Class C with the exception of sugar cane molasses. Although sugar cane molasses can be used as a feed item, it is also used as a food. Therefore, as per point 6 in CX/PR 19/51/8 ("Also when a small part of the total quantity of a product is used as food and most of it is intended as animal feed, then commodity will be included in processed food commodities and not classified as a feed commodity."), sugar cane molasses should be retained in Class D.

Egypt

Egypt agrees on the classification mentioned in the following documents:

Document no. CI 2019/19-PR related to: Revision of the Classification of Food and Feed (CXM 4-1989) Transfer of processed commodities from Class D: Processed Food Commodities of Plant Origin to Class C – Primary Feed Commodities Request for comments at Step 3

Ghana

Position: Ghana supports the proposed transfer of commodities from Class D to Class C.

Rationale: The transfer of commodities from Class D to Class C follows the approach agreed by the CCPR50 on the revision of classification.