

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

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Agenda Item 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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DISCUSSION PAPER ON THE NEED FOR THE REVISION OF THE CODEX CLASSIFICATION ON FOODS AND ANIMAL FEEDS

(Prepared by the Netherlands)

Background

1. The Codex Classification on Foods and Animal Feeds was adopted by the 18th Session of the Codex Alimentarius Commission (CAC) in 1989. The Codex Classification was elaborated in order to ensure the use of uniform nomenclature and to classify foods into groups and/or sub-groups, with the purpose of clearly identifying commodities to which Maximum Residue Limits (MRLs) might be established by the Codex Alimentarius Commission. The Classification was intended to be an as complete as possible listing of food commodities in trade, and classified into groups on the basis of commodity's similar potential to contain pesticide residues.

2. In the 24th Session of the Codex Committee on Pesticide Residues (CCPR) in 1992 changes were proposed and supported in order to facilitate the computerisation of the classification. The main proposed change was a different numbering system, which would permit the addition of new types of commodities without changing the numbering system. Another modification was related to the synonyms for commodities, which were not previously numbered in the classification system; synonyms would be numbered in a series beginning at 4000. These changes were confirmed by the 20th Session of the CAC in July 1993. The Classification was published in Section 2 of the *Codex Alimentarius*, Second Edition, Volume 2, but since it was prepared before the 20th Session of the CAC, these modifications were not included in the Classification.

3. For more than ten years, the Classification has been used successfully as the basis for MRL setting in JMPR and CCPR. However, in the past decade new food crops have been introduced on the market, the scientific basis of grouping of commodities has been discussed, expansion of the use of the Classification to

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contaminants has been discussed within the Codex Committee on Food Additives and Contaminants (CCFAC), and interest has increased to harmonise existing (regional) classifications to an universal classification intended to be used world-wide.

4. Taking into account these and other considerations, at the 32th session of the CCPR in 2000 the Observer of the EC, supported by a number of delegations, indicated that there was a need to update the Codex Classification. The Committee agreed that the Netherlands should prepare a short discussion paper on the subject for consideration at its next Session to explore if, how and to what extent the existing Classification should be reviewed and updated.

5. At the 33rd Session of the CCPR in 2001 the delegation of the Netherlands introduced a proposal (contained in Conference Room Document 17) regarding a possible update of the Classification. In the document the following options for the update of the Classifications were considered:

- Inclusion of newly introduced products of plant origin
- Inclusion of new plant varieties as a result of cross breeding
- Revision of animal products, especially with the aim of harmonising with definitions used by the Codex Committee on Residues of Veterinary Drugs in Food (CCRVDF)
- Expansion of its uses to accommodate uses by other Codex Committees, like CCFAC
- Review of the sections dealing with the portions to which the MRLs apply
- Inclusion of processed products, a.o. for intake estimations

6. While there was general support to update the Classification some delegations drew the attention to specific items, such as that the work should be coordinated with other Codex Subsidiary Bodies. The Committee agreed to ask for information by a Circular Letter to what extent the Classification should be updated and which new commodities should be added, and requested the Delegation of the Netherlands with assistance of Japan, New Zealand, Sweden, the USA and the WHO to prepare a paper for consideration by the next session of the Committee.

Summary of Comments Received from Governments

7. In response to the Circular Letter (CL2001/14-PR, Part B, Item 3) comments were received from the USA, New Zealand and Brazil.

8. The government of Brazil proposed to change the grouping of crops in FI- ASSORTED TROPICAL AND SUBTROPICAL FRUIT (INEDIBLE PEEL) AND FT – ASSORTED TROPICAL AND SUBTROPICAL FRUIT (EDIBLE PEEL) according to other criteria so that it also could be used for extrapolation, because these groups contain a large number of commodities from different taxonomical families and with different phenotypes, growing characteristics, behaviour and where the pesticides use is different. They will provide a proposal mid 2002.

9. Although the government of New Zealand believes that most of the classification system and commodity descriptions are still appropriate and need no revision, they propose to consider some specific points:

- Division of the group Berries and small fruits in sub-groups of cane fruits, bush fruits and others (e.g. strawberries and grapes)
- Tamarillo should be reclassified under Tropical & sub tropical fruits – inedible peel
- Division of the group Bulb vegetables in subgroups based on whether the edible portion is the root (onion, garlic) or the tops (spring onion, chives)
- Division of the Fruiting vegetables – Cucurbits in subgroups with edible and inedible peel
- Support any changes to harmonise the animal product definitions used by the CCPR and CCRVDF
- Inclusion of meat and eggs of “big birds” such as emus and ostriches as poultry products
- To reconsider the inclusion of bee products in the classification system

10. The government of the USA supports a major revision of the Classification. In their opinion there is a lack of many commodity names including preferred terms for harmonisation, a revision of Codex crop groups to more closely match the US Crop Groups is needed and the failure of listing many commodities (especially Asian and Latin American). Some more detailed examples were submitted:

- To include new commodities of not listed crops: cuphea, garden dahlia, daylily, dokudami, epazote, euphorbia, evening primrose, flameflower, zenmai fern, edible flowers, geranium (scented, lemon, rose), globe mallow, white ginger, ginko and ginseng.
- To revise the crop groups containing Brassica vegetables in a separate group of Brassica vegetables divided in subgroups
- To update the scientific names of the crops; for example rhubarb has received a new scientific name *Rheum X hybridum* Murray.
- To give better definitions for some general Codes such as AO2 0002 Fruit (except otherwise listed) and A01 0002 Vegetables (except otherwise listed).

Discussion

11. There is a general support to update the Classification.

12. One of the objectives of the Codex Alimentarius Commission is to protect the health of consumers and to ensure fair practices in food. Therefore in revising the Codex Classification the following points needs to be considered:

- The amount of intake and volume of trade of each commodity. As Codex MRLs are normally established for commodities which are moving in international trade in bulk and may contain pesticide residues, and whose dietary intakes significantly contribute to the exposure to relevant pesticides, it seems important to identify and include those food commodities meeting the above criteria in the Classification.
- The potential impacts of various options of the revision on: already adopted Codex MRLs (to what extent they need to be amended?); portions of commodities analysed; methods of sampling; and member countries which have already used the Codex classification at the national level for setting national MRLs.
- The classification of commodities is not only carried out from the taxonomic and morphological point of view but also from the use pattern of pesticides and the behaviour of pesticides residues in commodities.

13. The Committee should consider the following options for the update of the Classification:

- To consider the grouping and subgrouping of the commodities
- The grouping and subgrouping of the commodities could be changed in some groups as proposed by several governments. Due to the change of groups and subgroups the code numberings have to be changed, because within the current codes there is no opportunity for inserting new groups and subgroups. Also Codes of individual commodities have to be changed, when they are placed in other groups or subgroups. The changing of groups and subgroups of commodities could have an (substantial) impact on existing CXLs for commodity groups. Also a new numbering system for use in a computerised system could be considered.
- To include newly introduced products of plant and animal origin and new varieties as a result of cross breeding, which are important in international trade
- The inclusion of newly introduced products of plant and animal origin will not give problems, because in the current code system there are possibilities to include new commodities with new codes.
- To update the scientific names of the crops
- To further harmonise definitions of animal products used by the CCPR and CCVRDF. The CCPR and CCVRDF initiated the harmonisation of some commodities for which MRLs are recommended

by both Committees. The CAC at its 24th Session in 2001 adopted the amended Codex Classification of Foods and Animal Feeds (mammalian meat, mammalian fats, poultry fats and milk)(ALINORM 01/41, para. 147). The 13th Session of the CCRVDF in 2001 forwarded the amendments to the Glossary of Terms and Definitions (muscle, fat, milk and egg) to the 25th CAC for final adoption at Step 5 of the Accelerated Procedure (ALINORM 03/31, para. 52). However, there is still a need for further harmonisation.

- To revise the sections dealing with the introduction of the groups and subgroups and especially the sections dealing with the portions to which the MRLs apply. (Revised methods of sampling?)

The “Portion of Commodities to Which MRLs Apply” is contained in two different sections of Volume 2 of the *Codex Alimentarius*, Section 4.1 and Section 2. To avoid confusion this should only be included in a new Volume 2 in the Codex Classification. Also the consistency within the whole Codex Classification needs to be checked.

- To include processed products. The processed products should be limited to single-ingredient processed food, for instance canned, frozen commodities or fruit juices. In these cases parts of the commodities could be removed, for instance peel, stones.
- To harmonize/modify/expand the Classification for use by other Codex Committees, like the CCFAC. This needs an extensive discussion with experts from the other interested Committees, and can therefore not be realized in short time.

Recommendations

14. For the moment, it is recommended to limit a possible update of the Classification for CCPR purposes. In the CCFAC, for example, there is no consensus at this time using the classification for pesticides residues.

15. For the update the Classification two options could be identified: A limited update or a substantial update.

- A limited update should be restricted to some additions of new commodities important in international trade, mainly focussed on products of plant origin; updating of scientific names and considering the portions to which MRLs apply.
- A substantial update should include the modifications of the limited update, extended with the revision of the grouping and subgrouping of commodities, including the revision of the coding system, the harmonisation of definitions of animal products and the inclusion of processed products.

16. The Committee should determine the extent of revision of the Classification after comparing benefits and potential negative impacts (ref. para. 12) arising from such revision. The Committee should also consider whether creating or restructuring sub-groups of crops and utilising them in setting MRLs would be sufficient to address the problems mentioned.

17. In view of the limited response received on the Circular Letter it is recommend to the Committee to consider for the moment a limited update of the Classification.

18. To accommodate sufficient input for the revision of the Classification it is recommended to establish a drafting group with participants from different continents. The Delegation of the Netherlands is willing to co-ordinate this group.