

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Thirty-eighth Session

Hotel Vila Galé, Fortaleza, Brazil, 3 - 8 April 2006

COMMENTS ON THE PROPOSED DRAFT REVISION OF THE CODEX CLASSIFICATION OF FOODS AND ANIMAL FEEDS AT STEP 3

GENERAL

CANADA

Canada is pleased to offer specific details in its response on the limited revision of the Codex Classification of Foods and Animal Feed CL 2005/27-PR.

In 2005, the 37th CCPR (ALINORM 05/28/24, par 266) was informed of two simultaneous parallel revisions of food/feed classification being conducted, that of Codex CCPR led by the Netherlands and that of the U.S-IR4-ed International Crop Grouping Consulting Committee (ICGCC). The Committee was also informed that the 2005 JMPR (General Considerations 2.4) had noted the two ongoing revisions and had urged collaboration between the two workgroups to create harmonized systems.

CL 2005-27 PR also requested information on the part of the crop, that is used for consumption, description of the commodity (e.g size, morphology), and how it is consumed (eaten fresh, peeled, cooked etc). CL2005-27PR also listed new commodities proposed for inclusion in crop groups, amendments of crop names, synonyms, scientific names, expansion of codes, regrouping of commodities etc. In addition comments were solicited on the CCFAC proposal to expand the classification to include general and specific primary product codes and codes for specific processed products (e.g. fruit chutney, juices etc).

Canada supports a formal linkage between the CCPR and the US-IR4 activities on crops and crop groupings to ensure that a comprehensive harmonized scheme be established as a result of the Revision of the Codex Classification of Foods and Animal Feeds. In addition, Canada encourages CCPR to recommend that the use of representative crops be investigated by the CCPR in order to facilitate the establishment of crop group MRLs, to the extent possible, at the international level.

Itemized specific Canadian comments (Appendices I, II and III) are attached for consideration by the 38th CCPR.

APPENDIX I Part 1: PROPOSED NEW ENTRIES FOR COMMODITIES AND NEW SUBGROUPS

AUSTRALIA

Group 010 Brassica vegetables (VB)

Subgrouping of the group: Australia supports the proposed subgroups 10A, 10B and 10C, however considers that the naming should be changed, i.e. *head cabbages* revised to *head brassicas*; *flowerhead cabbages*

revised to *flowerhead brassicas* and *stem cabbages* to *stem brassicas* to better reflect the members of the subgroups.

Group 012 Fruiting vegetables, other than Cucurbits (VO)

Subgrouping of the group: Australia supports the proposal to divide the group Fruiting vegetables other than Cucurbits into two subgroups 12A and 12B.

Australia does not support removing the sweet corn entries to group 20 cereals.

Although pre-sowing, soil uses and pre-harvest uses for sweet corn may be the same as for maize, post-harvest uses are completely different for other cereals and maize compared to sweet corn. Including sweet corn in the cereals group would preclude the ability to establish a group cereal grain MRL for post-harvest or grain protection uses.

Sweet corn does not fit in the current fruiting vegetables group and in this regard is similar to mushrooms, which also does not fit in the current group. Such “misfits” are counterproductive for setting group MRLs and in most cases residue data would always be required to establish an MRL for the “misfit”, i.e. there is little room for extrapolation from other commodities.

Australia proposes that some miscellaneous commodities such as sweet corn and mushrooms (fungi), which do not fit properly in their current group, are recognised separately in another group, such as a ‘miscellaneous commodities’ group. A criterion for adding entries in a miscellaneous group may be the necessary generation of residues trial data to establish an MRL for that commodity, as the commodity does not fit into an existing group and extrapolation from other commodities would not be appropriate.

Group 016 Root and tuber vegetables (VR)

New entries: Australia supports the proposal to add new entries to the group. Australia requests that the Committee also consider adding Ginger (HS 0784) and Turmeric root (HS 0794) to the VR group, to represent the fresh root as commonly cultivated, consumed and traded in parts of the world.

Group 027 Herbs (HH)

New entries: Australia supports the proposal to add new entries to the group. Additional information is provided in relation to the entry for Aniseed myrtle *Anetholea anisata*; formerly *Backhousia anisata* (HH 0755) in the links below:

<http://www.daleysfruit.com.au/bushfood/aniseedmyrtle.htm>

<http://farrer.riv.csu.edu.au/ASGAP/APOL25/mar02-5.html>

Group 028 Spices (HS)

Australia supports the proposal to divide the group into subgroups 028A to 028 G and also supports the proposal to add new entries.

In the proposed entry for wattle seed (HS 0799), the scientific name should be modified from *Acacia spp.* to *Acacia victoriae* and other spp¹.

Regarding the entries for Japanese ginger (HS 0807) and Galangal (HS 0808), cross-reference to the VR group to represent the fresh root as cultivated and traded, is requested (see associated comments for ginger and turmeric root in group 016 root and tuber vegetables).

¹ Reference: Australian Government Rural Industries Research and Development Corporation Publication No. 04/125, The New Crop Industries Handbook September 2004.

Group 066 Teas (DT)

New entries: Australia supports the proposal to add new entries to the group. Additional information is provided in relation to the entry for Forest berry herb *Eucalyptus olida* (DT 1115) in the link below:

<http://www.atasteofthebush.com.au/listproduct.asp?prodid=8>

CANADA**Group 001 Citrus fruit (FC)**

Canada has no objection to the proposed new entries.

Group 002 Pome fruit (FP):

No changes.

Group 003 Stone fruit (FS):

Canada has no objection to the proposed new entries.

Group 004 Berries and other small fruits (FB):

Canada has no objection to the proposed new entries.

Sub grouping of the group:

The group Berries and small fruits is divided into three subgroups:

4A Cane berries; 4B Bush berries; 4C other small fruited berries

Canada does not have a subgroup for other small-fruited berries. Canada will be reconsidering the subgroups.

Group 005 Assorted tropical and sub-tropical fruits – edible peel (FT):

Canada has no objection to the proposed new entries.

Group 006 Assorted tropical and sub-tropical fruits – inedible peel (FI):

Canada has no objection to the proposed new entries.

Group 009 Bulb vegetables (VA)**Sub grouping of the group**

Canada has no objection to the proposed subgroups. Canada will be reconsidering the subgroups.

Group 010 Brassica vegetables (VB)

Canada supports the addition of a subgroup leafy Brassica greens. At this time, Canada has a separate group for Leafy Vegetables, which are divided into 2 subgroups.

Group 011 Fruiting vegetables, Cucurbits (VC):**Sub grouping of the group**

Canada has no objection to the proposed subgroups. Canada has no objection to the proposed new entries.

Group 012 Fruiting vegetables, other than Cucurbits (VO)Sub grouping of the group

The group Fruiting vegetables other than Cucurbits is divided into two subgroups: 12A Fruiting vegetables other than Cucurbits 12B Mushrooms Sweet corn entries removed to group 20 Cereals (letter codes have to be changed later).

Canada does not consider mushrooms as fruiting vegetables, but as fungi. Canada supports the removal of sweet corn from the fruiting vegetables. Canada has no objection to the proposed new entries.

Group 013 Leafy vegetables (including Brassica leafy vegetables) (VL):

Canada has no objection to the proposed new entries.

Group 014 Legume vegetables (VP):

Canada has no objection to the proposed new entries.

Group 016 Root and tuber vegetables (VR):

Canada has no objection to the proposed new entries. Ginseng and Japanese ginger should be classified in group 016.

Group 022 Nuts and seeds (TN):

Canada has no objection to the proposed new entries.

Group 023 Oilseed (SO):

Canada has no objection to the proposed new entries.

Group 024 Seed for beverages and sweets (SB):

Canada has no objection to the proposed new entries. Canada does not have such a crop group.

Group 027 Herbs (HH):

Canada has no objection to the proposed new entries.

Group 028 Spices (HS):

Canada has no objection to the proposed new entries.

Group 065 Cereal grain milling fractions (CF):

Canada has no objection to the proposed new entries.

Group 066 Teas (DT):

Canada has no objection to the proposed new entries.

Group 036 Poultry meat (including Pigeon meat):

Canada has no objection to the proposed new entries.

APPENDIX I Part 2: OTHER AMENDMENTS (SYNONYMS, SCIENTIFIC NAMES, EXPANSION OF CODES, REGROUPING)**AUSTRALIA****Proposals in Appendix IX of ALINORM 04/27/24 not included in this revision:**

Muntries: The proposed entry for Muntries *Kunzea pomifera* (FB 0283) is supported.

Mountain Pepper Berry: This is not the same as Muntries. Further information for Mountain pepper berry (*Tasmannia lanceolata*) is included in Attachment 2. It is proposed for inclusion in group HS subgroup 028B fruit or berry.

Riberry: Additional information regarding Riberry (*Syzygium luehmannii*) is provided in Attachment 1. It is proposed for inclusion in the group FB, where other members of the myrtaceae family are listed.

CANADA**Regrouping commodity groups:**

Canada is of the opinion that leafy Brassicas should be included in the Brassica vegetable group (VB). Canada supports the proposal to create a new crop group to encompass the foliage of root and tuber vegetables. Canada also supports subdividing the Cereal Grain group (GC) into subgroups.

APPENDIX II: OTHER PROPOSALS**AUSTRALIA****Deletion of 4000 Codes for synonyms**

As indicated in the response to CL 2004/16 – PR, Australia fully supports the proposal of deleting the 4000 codes for synonyms. There is agreement with the Delegation of the Netherlands, in that there are numerous confusing synonyms that essentially refer to one commodity and allowing the codes to remain may lead to confusion, with commodities being incorrectly identified or incorrect codes being used.

Proposals for inclusion of commodities

Further information is provided in relation to the Australian proposal for Lemon aspen *Acronychia acidula*. The proposal is for inclusion in the group FI. This is consistent with the classification for silver aspen. Links to relevant information are included below:

<http://farrer.riv.csu.edu.au/ASGAP/APOL25/mar02-5k.html>

<http://farrer.riv.csu.edu.au/ASGAP/APOL25/mar02-5.html>

www.rainforestfoods.com.au/lemon_aspen_jelly.htm

Subgrouping of the Group FI Assorted tropical and subtropical fruits – inedible peel

The government of Malaysia has proposed that the above group be separated into three subgroups, as the present grouping covers a wide range of sizes and characteristics². The three groups are:

² 36th CCPR 2005, CRD 17.

Assorted tropical fruits and sub-tropical fruits – indistinct inedible peel

This group includes avocado, breadfruit, kiwifruit, custard apple, dragon fruit (pitaya), mango, papaya, passionfruit, pineapple, sapodilla, soursop.

Portion of the commodity to which the MRL applies: *whole fruit unless otherwise specified; e.g. pineapple after removal of crown. Avocado, mango and similar fruits with hard seeds: whole commodity after removal of stone but residue calculated and expressed on the whole fruit.*

Assorted tropical fruits and sub-tropical fruits – bunchy fruits with distinct inedible peel

This group includes banana, cat's eyes, duku, langsat, lychee, longan, rambutan, tamarind, salak.

Portion of the commodity to which the MRL applies: *whole commodity including separable inedible skin or husk and seeds and residue calculated and expressed on the whole fruit.*

Assorted tropical fruits and sub-tropical fruits – individual fruits with distinct inedible peel

This group includes durian, jackfruit, mangosteen, pomegranate.

Portion of the commodity to which the MRL applies: *whole commodity including separable inedible skin or husk and seeds and residues calculated and expressed on the whole fruit.*

From Australia's perspective, the proposed sub-groups appear reasonable. However further discussion and consideration should be given to the reasoning behind the proposal. For instance, how many of the commodities within each proposed subgroup would be representative enough (from a residues perspective) to allow the establishment of a MRL for that subgroup? For example, data from how many of the members of the bunchy fruits sub-group would allow establishment of a MRL for that sub-group? Is this the primary aim of the proposal?

Some member governments, including Australia, may have relevant data and experience that allow judgements to be made regarding extrapolation from one or two members of the proposed sub-group to the whole subgroup, and this would add more confidence to the proposals. Australia suggests that further discussion is encouraged along the lines of possible extrapolation on the basis of residues data.

Individual Proposals and Questions

FS 0014: The proposal to delete prunes from the fresh fruit classification is supported.

Spring onions and other whole bulb vegetables: they should not be removed to the leafy vegetables group, as they are all classed as members of the *allium* family. It should be noted however that there is no need to change the grouping of the commodities, if the way in which the commodity should be sampled for residue testing is well understood.

Revision of the Codex guide on "Portion of the Commodity to which the MRL applies"

The proposal from the government of Thailand to exclude the peel from the analysis of certain fruits such as durian, jackfruit and mangosteen, should be considered in the context of 'the purpose of the Codex MRL'.

Australia views this proposal as being a situation where the needs of MRLs for control-of-use (or monitoring GAP) are not the same as the needs of MRLs as food standards or as trading standards. The Committee should therefore discuss the proposal on the basis of how Codex MRLs are used by different member governments. Are they used as trading standards only? Or do some member governments use Codex MRLs to monitor GAP in their own countries (for control-of-use) as well as using them as trading standards?

When an MRL is used as a food standard or as a trading standard, particularly for international trade, interest would seem to lie in the residue in the edible portion of the commodity, rather than in the peel (or whole fruit).

If however, some member governments use Codex MRLs as part of their domestic system to monitor GAP, then residues must be determined on the whole fruit, including peel. There should be a relationship between application rate and residues in the peel (or whole fruit). Similarly, the PHI (or WHP) should also have an influence on the residues in the peel (or whole fruit). Residues measured on the whole fruit then give an indication of misuse of a product in terms of overdosing or not observing the PHI. Mostly there is no or very little residue in the edible part of the fruit, which is not a good indicator for compliance with GAP or control-of-use.

If the Committee did take the policy decision to consider residues in the edible portion only, this would not allow the use of Codex MRLs as default domestic standards for monitoring GAP. Some member governments that use Codex MRLs in this way would be at a disadvantage. In addition, there is the potential for confusion with respect to compliance with domestic standards in some countries, if the residue in the whole fruit is not considered.

These thoughts are put forward for discussion and consideration especially by the ASEAN countries.

CANADA

Deletion of 4000 codes for synonyms

There are numerous confusing synonyms that refer to one commodity. Therefore, Canada supports the deletion of the 4000 codes for synonyms.

Proposals for inclusion of commodities

Canada does not support the proposal for a sprouting vegetable group. The commodities listed are already listed in groups as seeds. Canada supports the proposal for new commodity groups for honey, pollen and other bee products; poultry products: meat and eggs of big birds.

Sub grouping of the Group FI Assorted tropical and sub-tropical fruits – inedible peel:

Canada supports the proposal to create subgroups for assorted tropical and sub-tropical fruits. However, for each of the subgroups, representative commodities will need to be selected in order to allow for extrapolation of residue data and subsequent establishment of MRLs for the subgroups.

Sub grouping of Group VR Root and tuber vegetables:

Canada supports the proposal to create a subgroup for root and tuber vegetables: root vegetables and tuberous and corm vegetables.

Individual proposals and questions

FS 0014 Prunes are dried plums; FS 4072 Prunes are dried plums; DF 0014 Prunes is included in Dried Fruit.

Prunes, generally speaking, are plums that are suitable for drying because of their high sugar content, which prevents them from moulding around the pit. However, there are varieties of prunes that are excellent in their fresh form (i.e. Castleton prunes, prune plums from British Columbia). Therefore, Canada does not support the proposal to delete prunes from the fresh fruit classification.

FT 0299 Hog plum; FI 0348 as Mombin:

Canada supports the proposal to make a reference of Yellow Mombin to Hog Plum in the group edible peel since they are both common names of the *Spondias mombin* L. species.

VR 0596 Sugar beet:

Sugar beet tops are completely edible as a cooking green. When the plant is young, it is used in salads. Therefore, Canada does not support removing this crop from its current classification.

VS 0469 Witloof chicory sprouts:

Canada supports the proposal to list witloof chicory in the leafy vegetables crop group (VL).

Spring onion and other whole bulb vegetables (onion, welsh, fennel Italian):

Canada does not support removing bulb vegetables to the leafy vegetable group. However, fennel should be listed in the stalk and stem vegetables group (VS) even if it has a bulbous base.

Consideration should be given to some parts of vegetables for which it is difficult to classify into the existing groups e.g. flower vegetables (edible flower) or shoots and tips of vegetables (Cucurbits and legume vegetables):

Vegetables should be listed in crop groups or subgroups that best describe the predominant consumption pattern (e.g. the greatest edible portion of the commodity).

Some commodities are not really related to the group they are classified in: e.g. watermelon and cantaloupe are fruits and not fruiting vegetables, Mushrooms are not vegetables.

Watermelon and cantaloupe belong to the Cucurbitaceae family. Mushrooms should not be considered a fruiting vegetable, but classified as fungi.

The word ‘Assorted’:

Canada supports the removal of the word “assorted” from the title of the FI and FT groups.

Revision of the Codex guide on “Portion of the Commodity to which the MRL applies:

Canada does not support the proposal to exclude the peel of tropical and sub-tropical fruits with inedible peel from the analysis. Although the peel is inedible, in some instances, the whole fruit is processed to extract juice. Also, the MRL applies to the whole fruit as found at farm gate and in trade.

APPENDIX III: PROPOSALS OF THE CCFAC FOR EXPANDING THE CLASSIFICATION**AUSTRALIA**

Australia supports the proposal to include codes that may accommodate the needs of CCFAC. The proposed codes should be clearly identified to users as being appropriate to the needs of CCFAC rather than the needs of CCPR, although there may be a few codes that are common to the needs of both Committees.

CANADA

Canada supports the proposal to include codes to accommodate the needs of CCFAC. The codes should be explicitly identified as fulfilling the needs of CCFAC.

THAILAND

We appreciate the Netherlands’ effort on preparing the document as attached to CL2005/27-PR. In general we can support this document and agree with most of the proposal in this document. We have comments and information for specific commodities as presented in the following table.

Specific comments and Information on CL2005/27-PR

page	Commodity	Information/Comments
5	Marian Plum	The scientific name of Marian Plum (Maprang) grown in Thailand is <i>Bouca burmarico</i> Griff. .
7	Coconut, young	We confirm the information presented in CL 2005/27-PR. The flesh and water of young coconut are consumed fresh or are used as ingredients for other foods.
7	Langsat, Longkong	Langsat and Longkong are two different fruits commonly grown in Thailand. The scientific name of Langsat is <i>Aglaia domestica</i> Pelleg. while the name of Longkong is <i>Aglaia dookoo</i> Griff. .
9	Brassica vegetables	We agree to not include Leafy Brassica as a forth group of Brassica vegetables.
10	Water mimosa	The scientific name of Water mimosa grown in Thailand is <i>Neptunia oleracea</i> Lour. .
12	Kaffir Lime Leaves	The synonym of Kaffir Lime Leaves grown in Thailand is Leech lime leaves.
12	Lemongrass	The scientific name of Lemongrass grown in Thailand is <i>Cymbopogon citratus</i> (DC.) Stapf .
12	Pennywort	The scientific name of Pennywort grown in Thailand is <i>Centella asiatica</i> Urban. .
13	Coriander, root	We agree with the proposal in CL 2005/27-PR. The root part of Coriander is used as a spice ingredient in many asian foods.
14	Ostrich meat	Ostrich meat should be placed in group PM-Poultry meat
15-16	Java apple, Guava, Longan, Pummelo, Water Convolvulus, Basil, Sentul, Tamarind	We confirm our previous proposals as presented in Appendix I, Part 2.
15,20	Ginger root, Tumeric root; Galangal, greater; Galangal, lesser	If these commodities are placed into two groups (HS and VR) explanations are needed to distinguish the commodities in different groups. If there are no differences of commodities either by varieties or pattern of consumption they should be placed into HS group only.
17	Cereal grains	We do not support the subgrouping of Cereal grains into Small grains, grains and immature grains.
19	Chinese persimmon	As per our information, <i>Eugenia malaccensis</i> L. is a tropical fruit-edible peel which is called Malay apple. As in the existing classification, Malay apple (FI 4138) is the same fruit as Pomerac (FT 308). Our suggestion is just move Malay apple to FT group.
20	Perrilla leaves	The common name, synonym and scientific name of this commodity should be Perilla leaves, Tree basil and <i>Ocimum gratissimum</i> L. .

page	Commodity	Information/Comments
21	Watermelon and cantaloupe	These two commodities are not vegetables. They are normally consumed as fruits and should be placed in group FI.
22	Portion of the commodity to which the MRL applies	We confirm our previous comments and information presented in CL 2005/27-PR.

Attachment 1 (AUSTRALIA)

Information Input Sheet

Name of information provider:

1. Sibylla Hess-Buschmann, Australian Native Food Industry (ANFI)
2. Alan Norden, APVMA

Contact details:

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Date of information forwarded: 4/2/2005

Commodity name or preferred name (add common names in parenthesis and provide origin of the common names): Riberry
Plant family name: Myrtaceae
Recognized scientific name & synonyms: <i>Syzygium luehmannii</i>
Plant descriptions (from the standpoint of potential surface exposure to pesticide residues that may occur in the plant part used for food or feed): Similar to other "bush" berries (suggest highbush – Subgroup 13D).
Crop information (as provided in the monograph, such as crop season; availability in the market; plant density; days to saleable plants; yields of crop/acre; production for export or domestic markets; preparation for cooking i.e. washing, peeling, boiling. Season December/January; available as frozen berries year round; Yield: 3kg/tree year 3; 10 kg/tree year 6; Production for export and domestic markets 3-5 tonnes annually; Preparation for cooking: none Links: http://www.clw.csiro.au/nativefoods/crops/riberry.html
Area of the crop in the region/State, e.g. no. of growers: not known
Crop production regions outside the U.S.: Queensland, New South Wales & Victoria.
Edible portion of the crop in commerce: berries fresh,

General use(s) of edible part(s) of the crop: used as a flavouring fruit in fruit salads, ice cream, cakes, slices, sauces, chutneys, dressings.
Suggested representative commodities: Similar to other “bush” berries (suggest highbush – Subgroup 13D).
References: http://www.clw.csiro.au/nativefoods/crops/riberry.html
Other comments: nil
Contact details of industry association or regional grower group: Australian Native Food Industry Sibylla Hess-Buschmann PO Box 6136 South Lismore NSW 2480

Attachment 2 (AUSTRALIA)

Information Input Sheet

Name of information provider:

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Date of information forwarded: 4/2/2005

Commodity name or preferred name (add common names in parenthesis and provide origin of the common names): Mountain Pepper Berries
Plant family name: Winteraceae
Recognized scientific name & synonyms: <i>Tasmannia lanceolata</i>
Plant descriptions (from the standpoint of potential surface exposure to pesticide residues that may occur in the plant part used for food or feed): Refer to links/references for background, briefly – shrub to a small tree (2-5 metres high and wide), produces berry-like fruits 5-10 mm in diameter, harvested in summer to autumn.
Crop information (as provided in the monograph, such as crop season; availability in the market; plant density; days to saleable plants; yields of crop/acre; production for export or domestic markets; preparation for cooking i.e. washing, peeling, boiling). Season: leaves all year, berries summer and autumn; available all year as dried, frozen or milled product; Pepper berries are primarily harvested from the wild from forestry concessions in Tasmania, though the first commercial plantations are maturing, reliable data on yield/ha is not established. Mountain pepper leaves and berries are sold in the domestic and export markets; preparation for cooking: none;
Links: http://www.clw.csiro.au/nativefoods/crops/pepper.html

http://www.pir.sa.gov.au/pages/agriculture/agfactsheets/vegetation/mtpepper.pdf
http://farrer.riv.csu.edu.au/ASGAP/APOL25/mar02-5.html
Area of the crop in the region/State, e.g. no. of growers: not known
Crop production regions outside the U.S.: Tasmania, Victoria, Sth New South Wales and ACT.
Edible portion of the crop in commerce: pepper berries and leaves
General use(s) of edible part(s) of the crop: used to flavour sauces, chutneys, meats, cheeses, pate, breads, dampers, pasta
Suggested representative commodities: Similar to other “bush” berries (suggest highbush – Subgroup 13D).
References: website links provided above.
Other comments: nil
Contact details of industry association or regional grower group: Australian Native Food Industry, Sibylla Hess-Buschmann PO Box 6136 South Lismore NSW 2480