

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda Item 8(b)

CX/PR 14/46/8-Add.1

April 2014

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

46<sup>th</sup> Session

Nanjing, P. R. China, 5-10 May 2014

**COMMENTS on the proposed draft revision of the Classification of Foods and Animal Feeds at Step 3:  
Other selected vegetable commodity groups,  
submitted by Canada, China, El Salvador, European Union, Kenya, United States of America and African Union**

#### Canada

Canada's position on the proposed draft revisions to the commodity groups fruiting vegetables, cucurbits; legume vegetables, and pulses:

Canada supports the proposed revisions to these commodity groups with no additional comments. It is noted that as a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the proposed revisions presented in CX/PR 14/46/8. It is noted that Canada is also a member of the ICGCC and revisions to these crop groups are still in the proposal stage. Efforts should therefore be made to ensure consistency between the proposed Codex revisions to these commodity groups (11, 14, 15) with the proposed revisions through the work of the ICGCC.

#### China

**China agree with EU and to divide Group 11 - Fruiting vegetables, Cucurbits into 2 subgroups: Cucurbits – edible peel and Cucurbits – inedible peel, because of the exposure to pesticides. VC 0427 (Loofah, Angled) and VC 0428 (Loofah, smooth) is the commodity of inedible peel**

**China proposes to add the new commodity of *Trichosanthes kirilowii* in Subgroup 011A Fruiting vegetables, Cucurbits - edible peel, its English name is Chinese cucumber.**

#### *Trichosanthes kirilowii*

English name: Chinese cucumber

Latin name: *Trichosanthes kirilowii* Maxim

*Trichosanthes kirilowii* is a flowering plant in the family Cucurbitaceae found particularly in Henan, Shandong, Hebei, Shanxi, and Shaanxi, China. Its young fruit can be used as vegetable. It is one of the fundamental herbs used in traditional Chinese medicine. It is known as Chinese cucumber in English.

[http://en.wikipedia.org/wiki/Trichosanthes\\_kirilowii](http://en.wikipedia.org/wiki/Trichosanthes_kirilowii)

**For the commodity of VC 2681 Chinese cucumber, China proposes to change its English name to Mubieguo. Chinese cucumber is other commodity called as *Trichosanthes kirilowii*.**

The scientific name of VC 2681 is given as *Momordica cochinchinensis* (Lour.) Spreng. From the name, it can be known from the website that it is a Southeast Asian fruit found throughout the region from Southern China to Northeastern Australia, including Thailand, Laos, Myanmar, Cambodia and Vietnam. It is known as Mubieguo in Chinese.

[http://en.wikipedia.org/wiki/Momordica\\_cochinchinensis](http://en.wikipedia.org/wiki/Momordica_cochinchinensis)

#### For the commodity of Chick-pea

Chick-pea is included in Subgroup 014D and Group 015, with the code of VP 2880 and VD 0524, respectively. The number should be same.

#### For the commodity of Lima bean

Lima bean is included in Subgroup 014C with the code of VP 0534, while there is other code of VP 2865. It should be corrected to VP 0534 for Lima is also included in Group 015 with the code of VD 0534.

### For the subgroup name of 015A and 015B

The group name should be concise. China propose to change them to “15A Dried beans, 15B Dried peas”, and the words “without pods” should be deleted or give the information in the description of the group.

### El Salvador

We support Japan’s proposal regarding the Classification of group 014 ‘Legume vegetables’ in 2 subgroups: Legume vegetables with pods and Legume vegetables without pods because the slight difference in shapes and surfaces of peas and beans will probably not result in a significant difference in pesticides residue levels.

We support the proposed classification for group 015 "Pulses" using the 2 subgroups:

15A Dried beans (without pods)

15B Dried peas (without pods)

### European Union

The European Union (EU) would like to thank the Electronic working group led by the Netherlands and the United States of America for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds for the three commodity groups:

- Fruiting vegetables, cucurbits;
- Legume vegetables;
- Pulses.

The EU acknowledges that its comments made in the electronic working group have been considered and supports the advancement of the document CX/PR 14/46/8 to the next step.

However, the EU would like to re-iterate two requests which have not been taken into account:

- a) The proposal to include the species Bambara groundnut (*Vigna subterranea*; syn: *Voandzeia subterranea*) and Kersting’s groundnut (*Macrostyloma geocarpum*; syn: *Kerstingiella geocarpa*) in separate subgroups ("groundnuts"). Since the edible parts of these species develop underground, this classification would be more appropriate than the current proposal, which includes Bambara groundnut in the subgroup 14C "Succulent beans without pods" (as Legume vegetable) and Bambara groundnut and Kersting’s groundnut in the subgroup 15B "Dried peas without pods" (as Pulses).
- b) The proposal to divide the Group 11 Fruiting Vegetables, Cucurbits in only two subgroups (edible and inedible peel), instead of three subgroups (edible peel, inedible peel-melons, inedible peel-winter squashes).

In addition the EU would like to underline a nomenclature discrepancy. In the Subgroup 14A Beans with pods, the entry VP 0061 is defined as "Beans, **except broad bean and soya bean** (*Phaseolus* spp.)". The EU considers not necessary to mention here the species broad bean and soya bean, as they do not belong to the genus *Phaseolus*.

This would be also in line with the similar entry VP 0062 (in the Subgroup 14C Succulent beans without pod), where the entry is "Beans without pods (*Phaseolus* spp.)".

### Kenya

16. The existing commodity VP 0520 Bambara groundnut is included in subgroup 14C Succulent beans without pods. This crop is different from the other pulses included in this group. Their pods grow underground like a peanut/or groundnuts.

Kenya supports the inclusion of these products as vegetables however, We would like to propose that this committee to consider including these commodities[ Bambara.groundnuts/peanuts **VD 0520 VD 0563 respectively**] in a separate subgroup in the group of Legume vegetables under pulses. In addition to this, their pods grow underground and therefore they tend to have lower MRLs than the crops grown above the ground which the pesticide is applied to directly.

### United States of America

The US Delegation has reviewed the proposals for Group 011 Fruiting Vegetables, Cucurbits. Included is a proposal to divide the cucurbits into three subgroups: Cucurbits - edible peel, Cucurbits - inedible peel - melons, and Cucurbits - inedible peel - winter squashes. The US Delegation does not agree with the proposal to establish three subgroups. Additionally, the US would like clarification as to what additional documentation has been provided to support the creation of these three subgroups. The paper circulating by the Electronic Workgroup notes that Japan, the EU and New Zealand would prefer to have three subgroups but it does not appear that any additional information has been provided to justify why the separation of cucurbits into three subgroups is appropriate. Nor is there an explanation why this is the preferred approach despite the extensive information provided by the US Delegation to support the two subgroups.

The US Delegation provided documentation including a monograph for each commodity proposed for addition to the Group 011 Fruiting Vegetables, Cucurbits as well as a justification as to why two subgroups, Cucurbits - melon and Cucurbits - squash/cucumber, were appropriate. The information gathered for the proposal made by the US came about after extensive work with the International Crop Group Consulting Committee (ICGCC). The revised cucurbit crop group proposal submitted to the Codex Electronic Workgroup was initiated at the USDA/IR-4 2002 International Crop Grouping Symposium and was discussed and developed within the Cucurbit Vegetable Workgroup of the ICGCC. This workgroup consisted of 62 U.S. crop or regulatory experts from agriculture commodity groups, universities, agrichemical industry, IR-4 Project, USDA and EPA, and also 79 international crop or regulatory experts representing 28 countries. The Cucurbit Vegetable Workgroup of the ICGCC discussed additional crops and validated each of the proposed commodities. Existing commodity monographs were researched and updated. New commodity monographs were developed as supporting data. An important aspect of developing this revised crop group was harmonization with the Codex Crop Classification of Foods and Animal Feeds. The IR-4/EPA Crop Grouping Working Group and the ICGCC are making every effort to collaborate with the revision of the Codex crop classification. However, harmonization does not seem possible if the Electronic Working Group chooses to disregard the work of the ICGCC.

While the proposed Codex edible peel subgroup 011A and the Codex - inedible peel - melons subgroup 011B are in line with the subgroups proposed by US Delegation through its work with the ICGCC, the proposed Codex subgroup 011C, winter squashes inedible peel appears to be an artificially created group that includes melon commodities, cucurbits and winter squashes. The US does not agree the data provided by the US Delegation supports the establishment of this third subgroup.

The main purpose of this crop grouping effort is to allow for the use of crop groups to establish tolerances for multiple commodities, especially minor and specialty crops, based on data from representative commodities. This will provide growers with a greater number of necessary pest control tools for food production. The US does not agree that this third subgroup is consistent with the concept of representative commodities. Winter squashes are generally defined as varieties of *Cucurbita* species that are harvested when the fruits are fully mature and the rinds are hard. However, casabanana, African horned cucumber, Chinese cucumber and Chinese waxgourd are proposed to be included in Codex subgroup 011C, winter squashes inedible peel, yet none of these commodities are *Cucurbita* species. Also, casabanana (*Sicana odorifera* (Vell.) Naudin) is considered to be a melon and consumed both in an immature stage (as a vegetable or in soups or stews) and as a dessert as a mature fruit. The African horned cucumber is also classified as a melon. Further, the Chinese cucumber (*Momordica cochinchinensis*), that is proposed for the Codex subgroup 011C, winter squashes inedible peel is harvested as an immature fruit which are cooked and used as vegetables and in curries. As well as the Chinese waxgourd (*Benincasa hispida* (Thunb.) Cogn.), which is consumed fresh and cooked as both mature and immature fruit.

In conclusion, the US Delegation does not agree with the proposed changes to the Group 011 Fruiting Vegetables, Cucurbits. The US Delegation respectively requests, in an effort to support this international activity that the CCPR support the efforts of the ICGCC and adopt two subgroups, Cucurbits - melon and Cucurbits - squash/cucumber subgroup, as originally proposed by the US Delegation and supported by the data provided by the US.

## **African Union**

Position: AU wishes to appreciate the work done by the Electronic Working Group led by Netherlands and the USA.

### **1. Fruiting vegetables, Cucurbits**

AU wishes to propose the inclusion of the *Cucumis metuliferus* to be named as the "Melon, horned", to be included in the "**Fruiting vegetables, cucurbits, inedible peel Melons**" and to be re-coded appropriately. This is because this fruit is eaten raw in many African countries and commonly called a "melon".

AU also proposes that since there are different views in having either two subgroups or three subgroups (edible, inedible – melons and inedible – winter squash); the committee should have further discussion to clarify the matter for drafting by the Electronic Working Group.

### **2. Legume vegetables.**

We would like to support the proposal made to have 2 subgroups namely "Legume vegetables with pods" and "Legume vegetables without pods" due to similarities in morphology.

AU also proposes the modification of the proposed group 015 for Pulses to be "Dried beans and peas (without pods)"; so that the group 015 is a single subgroup.

AU also proposes that since there are different views in having either two subgroups or three subgroups (edible, inedible – melons and inedible – winter squash); the committee should have further discussion to clarify the matter for drafting by the Electronic Working Group.

Rationale: For African member states, it is critical to look at the current classification for Fruiting vegetables, Cucurbits, Legume vegetables and Pulses and take note of the need to propose new additions to the group before its final adoption. This will allow for few residue trials, because the difference in pesticide residue levels will not be significant.

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