

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda Item 7(b)

CX/PR 15/477-Add.1

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

47<sup>th</sup> Session

Beijing, P. R. China, 13-18 April 2015

**Comments on the proposed draft revision of the Classification of Food and Feed at Step 3: Selected vegetable commodity groups (Group 011 Fruiting vegetables, cucurbits and Group 014 Legume vegetables), submitted by Canada, Chile, Costa Rica, European Union, Ghana, Japan, Kenya, United States of America and African Union**

#### Canada

#### Canada's Position on the Proposed Draft Revisions of the Fruiting Vegetables, Cucurbits Group (Group 011)

As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the proposed draft revisions to Group 011 presented in CL 2014/16-PR. As a result of comments received, 3 proposals/options for Group 011 Fruiting Vegetables, cucurbits were made:

OPTION 1: 3 subgroups divided as Subgroup 11A – Cucumber and Squash, Subgroup 11B – Melons, and Subgroup 11C – Winter Squashes

- New commodities to be added to this option: Chieh qua; Cucumber, exploding; Cucumber, stuffing; Gourd, bitter snake; Gourd, buffalo; Gourd, Malabar; Gourd pointed; Gourd, round; Ivy gourd; Japanese snake gourd; Tacaco; Melon, nara; Casabanana; Chinese cucumber; and Cucumber, African Horned.

OPTION 2: 2 subgroups divided as Subgroup 11A – Melon and Subgroup 11B – Squash/Cucumber

- New commodities to be added to this option: Casabanana; Cucumber, African Horned; Cucumber, Armenian; Melon, nara; Melon, white-seed; Monk fruit; Cucumber, brown-netted; Cucumber, exploding; Cucumber, stuffing; Gourd, bitter snake; Gourd, buffalo; Gourd, club; Gourd, fluted; Gourd, ivy; Gourd, Malabar; Gourd pointed; Gourd, round; Gourd, snake; Gourd, Xishuangbanna; Lard fruit; Lard fruit, Chinese; and Oysternut.

OPTION 3: 2 subgroups divided as Subgroup 11A – Cucurbits with edible peel and Subgroup 11B – Cucurbits with inedible peel

- New commodities to be added to this option: Chieh qua; Cucumber, exploding; Cucumber, stuffing; Gourd, bitter snake; Gourd, buffalo; Gourd, Malabar; Gourd pointed; Gourd, round; Ivy gourd; Japanese snake gourd; Tacaco; Melon, nara; Casabanana; Chinese cucumber; and Cucumber, African Horned.

Canada supports OPTION 2 (2 subgroups divided as Subgroup 11A – Melon and Subgroup 11B – Squash/Cucumber) for the following reasons:

- A review of the residue data used to support currently established Codex MRLs for the Fruiting Vegetables, Cucurbit Crop Group indicated that for MRLs where data were available for cucumber, summer squash, melon and either winter squash or pumpkins, the highest residues were found in melons.
- The use of cucumber, summer squash and melon data as the representative crops for a “cucumber/squash” subgroup would be considered as a “worse case” scenario with respect to residues and should adequately cover potential residues in winter squashes, including pumpkin.

- The separation of winter squash from summer squash based on “edible” vs “inedible” peel takes into consideration only one of the seven characteristics considered for crop grouping as listed in the Circular Letter CL 2014/16-PR of May 2014. If the other characteristics, including similar morphology, similar production practices, growth habits, etc; similar GAP for pesticide uses, similar residue behavior and flexibility for setting (sub)group tolerances are considered in a “weight of evidence” approach, the establishment of subgroup 011C is not necessary.
- The creation of a subgroup for winter squash would include primarily winter squash, pumpkins and some gourds, which would require trials in an additional representative crop; data that is currently not required by Codex. This would increase the regulatory burden and may impede the establishment of new MRLs if chemical companies are reluctant to generate more data. As previously mentioned above, the residue data currently required to support cucurbit crop group MRLs appears to adequately cover the winter squash, pumpkin and gourd commodities.
- In the section of the Report of the 46<sup>th</sup> Session of the CCPR (REP14/PR) concerning the proposed revisions to Group 011 Fruiting vegetables, Cucurbits, it was noted that “the JMPR Secretariat clarified that there were significant differences in the risk assessment for peeled and unpeeled products and that differences in exposure might also depend on culinary habits...”. Although the use of cucumber, melons and summer squash may overestimate residues in commodities that would be included in a “winter squash” subgroup, for risk assessment purposes, data other than the residue field trial values (e.g., monitoring data) could be used to refine an assessment where the risk was found to be unacceptable. As the majority of Codex MRLs are established for pesticides that have been registered in a number of countries, monitoring data should be available for individual commodities for refinement purposes.
- In addition, Canada is in agreement with the additional crops proposed under OPTION 2.

#### **Canada’s Position on the Proposed Draft Revisions of the Legume Vegetables Group (Group 014)**

As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the proposed draft revisions to Group 014 presented in CL 2014/16-PR. Noted changes to the document as a result of the comments received include:

- The addition of Catjang (immature pods and green seed) and Stink bean (pods and immature seeds) to Subgroup 14A – Beans with pods.
- The addition of Grass pea (young pods) to Subgroup 14B – Peas with pods.
- The addition of Catjang (succulent seeds), Cowpea (succulent seeds), Goa bean (succulent seeds), Stink bean (succulent seeds), and Velvet bean to Subgroup 14C – Succulent beans without pods.
- The addition of Chickpea (succulent seed) and Lentil (succulent seeds) to Subgroup 14D – Succulent peas without pods.

The rest of this group is the same as that previously vetted through the Electronic Working Group.

Canada is in agreement with changes made above for Group 014 and supports the proposed revisions to the legume vegetables group as presented in Appendix II of CX/PR 15/47/7.

#### **Chile**

##### **Comments on Group 11 Fruiting vegetables, cucurbits**

**Comment 1.** Regarding the recommendations made by the electronic Working Group, Chile supports **OPTION 1** and the proposals for new commodities.

Rationale: considering the parameters for the grouping of commodities in the Classification of Foods and Feeds, it is considered that the division into three subgroups is the most appropriate and representative.

**Comment 2.** It is proposed to insert the term *zapallito italiano* [zucchini] as synonymous with summer squash in **Subgroup 11A Cucumber and Summer Squash**.

Rationale: in Chile summer squashes are called *zapallito italiano*, therefore considering that it is a crop with significant economic projections for the country, it is requested inserting this terminology in the classification.

**Comment 3.** It is proposed transferring Gourd, Malabar from *Subgroup 11A Cucumber and Summer Squash* to **Subgroup 11C. Winter squashes** and with this inserting as a synonym the term *alcayota*.

Rationale: due to its morphology, similar production practices and habits of growth, it is considered more appropriate that it be classified under Subgroup 11c. In addition it is requested inserting the synonym *Alcayota*, a name that is widely used in Chile and Argentina.

Considering comments 2 and 3, it is proposed that OPTION 1 be as follows:

**OPTION 1 (3 subgroups):**

<b>Subgroup 11A Cucumber and Summer Squash</b>
Balsam apple; Balsam pear (bitter melon); Bottle gourd; Chayote; Chieh qua; Cucumber; Cucumber, exploding; Cucumber, stuffing; Gherkin; Gherkin, West Indian; Gourd, bitter snake; Gourd, buffalo; <del>Gourd, Malabar</del> ; Gourd, pointed; Gourd, round; Ivy gourd; Japanese snake gourd; Loofah, angled; Loofah, smooth; Snake gourd; Squash, summer ( <b><u>zapallito italiano</u></b> ); Tacaco
<b>Subgroup 11B. Melons</b>
Melons; Melon, Nara; Watermelon
<b>Subgroup 11C. Winter squashes</b>
Casabanana; Chinese cucumber; Cucumber; African horned; Pumpkins; Wax gourd; Winter squash; <b><u>Gourd, Malabar (alcayota)</u></b>

**Group 14 Legume vegetables**

Comment 4. Chile supports OPTION 1 proposed by the electronic working group, but it is proposed inserting the term *poroto* as a synonym for common bean in Subgroup 14A. Beans with pods and Subgroup 14C. Succulent beans without pods, as follows:

<b>Subgroup 14A. Beans with pods</b>
Black gram (Urd bean); Broad bean (green pods and immature seeds); Catjang (immature pods and green seed); Cluster bean (Guar); Common bean ( <b><u>poroto</u></b> ) (pods and immature seeds); Cowpea (immature pods); Goa bean (immature pods); Hyacinth bean (young pods (Lablab bean (pods))); Jack bean (young pods); Mat bean (green pods) (moth bean (pods)); Mung bean (green pods); Rice bean; Scarlet runner bean (pods) Soya beans (young pods); Stink bean (pods and immature seeds); Sword bean; Winged pea; Yard-long bean
<b>Subgroup 14B. Peas with pods</b>
Garden pea (young pods); Grass pea (young pods); Lentil (young pods); Pigeon pea (green pods); Podded pea (young pods)
<b>Subgroup 14C. Succulent beans without pods</b>
Bambara groundnut; Broad beans, shelled; Catjang (succulent seeds); Common bean ( <b><u>poroto</u></b> ) (succulent seeds); Cowpea (succulent seeds); Goa bean (succulent seeds); Hyacinth bean (immature seeds) (lablab bean (succulent seeds)); Jack bean (immature seeds); Lima bean (succulent seeds); Lupin; Mat bean (mature fresh seeds) (moth bean) (fresh seeds)); Soya bean (succulent seeds); Stink bean (succulent seeds); Velvet bean
<b>Subgroup 14D. Succulent peas without pods</b>
Chickpea (succulent seed); Garden pea (succulent seeds); Lentil (succulent seeds); Pigeon pea (young green seeds)

**Rationale:** In Chile *poroto* or common bean is an economic crop with projections, therefore it is of utmost importance for the country that the terminology proposed is considered in the Proposed draft.

**Costa Rica**

Group 011 Fruiting vegetables, cucurbits: Costa Rica gives its support to the proposed classification in option 3; with the division in: **Subgroup 11A Cucurbits with edible peel and Subgroup 11B. Cucurbits with inedible peel.** Taking into account that Good Agricultural Practices and other criteria are already considered in the trials to determine MRLs.

Group 014 Legume vegetables: Costa Rica has no additional comments.

## **European Union**

### **Paragraph 9 (Options for Group 011: Fruiting vegetables, cucurbits and Appendix I):**

The EU agrees with the seven criteria which should form the basis of the revision of the classification. Within the seven criteria the EU considers criterion 1 (commodity's similar potential for pesticides residues), criterion 4 (edible portion), criterion 5 (similar GAP for pesticides uses and criterion 6 (similar residue behaviour) the most relevant ones.

The EU has analysed the three presented options in view of these criteria.

In line with that, the EU considers Option 3 the most appropriate option as it considers the edible portion of the crop. The EU expects that there are different levels of residues in the edible portion of cucurbits compared to the whole commodity as well as differences in residue behaviour that may influence the residue definition for risk assessment (e.g. different metabolites formed in pulp and peel).

By differentiation of cucurbits with edible and with inedible peel, the different residue potential as well as a potentially different residue behaviour can be taken into account when setting MRLs.

However, the EU acknowledges that the way cucurbits are consumed may depend on national eating habits. The EU is open to discuss other options if it can be shown that the impact on consumer exposure of such potential differences in residue potential and residue behaviour of cucurbits with edible and inedible peel are negligible.

A possibility to show this might be a comparison of intake calculations for some uses that will be evaluated in the next JMPR Meeting for fruiting vegetables – cucurbits. These calculations should be done on cucurbits with inedible peel using a) the residues in the edible portion (with the appropriate residue definition of metabolites occurring in the edible portion) and b) the residues in the whole commodity (with the appropriate residue definition for the whole commodity).

Provided the outcome of the above mentioned calculation examples shows only small differences in exposure to consumers, the EU will reconsider its view and may be able to agree to

- an option in which subgroup 11A would be re-named into "Cucumbers and summer squashes" and subgroup 11B would be re-named into "Melons and pumpkins" and not to refer to "edibility" or "inedibility" of the peel.

#### Specific comment on the detailed commodities mentioned under the different options:

The specific commodities mentioned under paragraph 9 for the different options seem to be different depending on the option and do not match the list presented in the Appendix I. Completeness and consistency of all options with Appendix I needs to be checked.

### **Paragraph 10 (Options for Group 014: Legume vegetables and Appendix II):**

The EU is in favour of the proposed Option 1 which divides Legume vegetables into four sub-groups.

The proposed division takes into account the sub group's similar potential for pesticides residues, similar GAP, similar residue behaviour and also the way legumes are consumed (with or without pods).

## **Ghana**

- a) For Group 011 Fruiting vegetables, cucurbits, we support Option 1, which includes three subgroups:
  - Subgroup 11A Cucumber and Summer Squash
  - Subgroup 11B Melons
  - Subgroup 11C Winter Squashes

Our support for Option 1 is based on:

- commodities' similar potential for pesticide residues
- similar production practices
- edible portions
- similar commodity morphology

- b) For Group 014 Legume vegetables, Ghana supports Option 1.

#### **Rationale:**

Our support for the proposed option is based on:

- commodities' similar potential for pesticide residues
- similar production practices
- edible portions
- similar commodity morphology

## Japan

Japan would like to reiterate its proposals on criteria for crop/commodity grouping and the subgrouping of Group 011 Fruiting Vegetables, Cucurbits as follows:

### General comments on criteria for crop/commodity grouping

The 2013 JMPR Report describes the main principles for estimating group MRLs as follows:

*“group MRLs are only estimated if (1) the pesticide is registered for a group or sub-group of commodities as defined by the Codex Classification system and if (2) the median residue of the datasets of the commodities are within the “5 times range” to avoid an overestimation of the MRL beyond the natural variability of the data sets.”*

Based on the above principles, **Japan suggests that priority should be given to criteria number 1 (Commodity’s similar potential for pesticide residues) and 5 (Similar GAP for pesticide uses)** among the seven criteria mentioned in CL 2014/16-PR as they are the key determinants of group MRLs.

Although other five criteria mentioned in CL 2014/16-PR are important for crop/commodity grouping, for some commodity groups, it may not be feasible to satisfy all of these criteria. In such a case, these criteria should be considered on a case-by-case basis in the light of characteristics of commodities under consideration.

As regards whether the peels of cucurbit vegetables are edible or not, it is difficult to draw a clear line between cucurbits with edible peels and those with inedible peels due to variation of dietary habits among countries. For this reason, for the establishment of subgroups of Group 011 Fruiting Vegetables, Cucurbits, criterion number 4 (edible portion) is less important than those mentioned above, although whether the peel is edible or not is useful information for refining dietary exposure assessment. This was already pointed out by several members and the JMPR Secretariat at the last Session of the Committee.

### Specific comments on the subgrouping of Group 011 Fruiting Vegetables, Cucurbits

Japan agrees with the option 1 to divide Group 011 Fruiting Vegetables, Cucurbits into three subgroups: 011A Cucumber and Summer squashes, 011B Melons, and 011C Winter squashes. Especially, Japan supports the proposal to separate Cucumbers and Winter squashes into different subgroups because fruits of cucumbers and winter squashes are harvested at different stages of growth, which may result in different pesticide residue potentials. Another reason is that pre-harvest intervals (PHIs) of critical GAP of cucumbers are often shorter than those of winter squashes because cucumbers are generally harvested immature every day for a period of some months, while winter squashes are harvested at their maturity in a limited period at the end of cultivation. The detailed reasons are as follows.

#### 1. Difference in residue potentials at the time of harvest arising from different rates of enlargement of individual fruits

##### 1.1 Time of harvest in relation to growth stages of individual fruits

Cucumbers and zucchini (courgettes), one of summer squashes, are similar in that immature fruits, rapidly growing in size and weight, are harvested every day. For example, fruits of one of common cucumber cultivars in Japan (Tokiwa Hikari 3P) enlarge significantly from 3 days to 15 days after flowering. They are harvested during 10 – 12 days after flowering when the fresh weight is approximately 100 g/fruit. Fruits of one of zucchini cultivars in the United States (black zucchini) enlarge significantly from 3 days to 7 days after flowering. They are harvested during 3 – 5 days after flowering when the fresh weight is 100 – 300 g/fruit (see Table 1).

**Table 1. Period of significant enlargement and harvest of individual fruit of Cucumber<sup>1</sup> and Zucchini<sup>2</sup>**

Crop (Variety)	Period of significant enlargement of fruit (days after flowering)	Time of harvest (days after flowering)	Fruit weight at harvest (g / fruit)
Cucumber (Tokiwa Hikari 3P)	3 – 15	10 – 12	100
Zucchini (Black Zucchini)	3 - 7	3- 5	100 – 300

<sup>1</sup> Rural Culture Associations Japan. Yasai Engei Daihyakka Vol. 1. Cucumber, 99-100, 1988

<sup>2</sup> O.A. Lorenz. Summer Squash Harvest Time, California Agriculture, January, 1951  
(<https://ucanr.edu/repositoryfiles/ca501p6-71574.pdf>)

On the other hand, for melons and winter squashes, mature fruits are harvested well after the period of significant fruit enlargement because sugar/starch content of fruits begins to increase significantly after the end of that period.

For example, for melons, fruits of one of common cultivars in Japan (netted melon) enlarge significantly from 10 days to 15 days after flowering, and reach approximately 80% of the full size 20 days after flowering. And then fruits enlarge slowly until full maturity (about 13 cm in diameter and height) when they are harvested (approximately after 50 days of flowering). Sugar content of fruits increases significantly 30 days to 50 days after flowering. Although there is variation in the rates of fruit enlargement and fruit size at harvest, another cultivar of melons in Japan (Sunrise) shows similar tendency (see Table 2).

As for winter squashes, fruits of one of common cultivars in Japan (Ebisu) reach the full size 25 days after flowering, followed by significant increase in starch content of fruits up to 40 days after flowering. They are harvested approximately 40 days after flowering when the fresh weight is approximately 1,800 – 2,500 g/fruit. (see Table 2).

**Table 2. Period of significant enlargement and harvest of individual fruit of Melon<sup>3</sup> and Winter squash<sup>4</sup>**

Crop (Variety)	Period of significant enlargement of fruit (days after flowering)	Time when a fruit reaches full size (days after flowering)	Period when sugar <sup>a</sup> /starch <sup>b</sup> content of fruit increases (days after flowering)	Time of harvest (days after flowering)	Fruit weight at harvest (g per fruit)
Melon <sup>3</sup> (netted melon)	10 – 15	20 <sup>c</sup>	30 – 50	50	- { 13 cm (width) 13 cm (height) }
Melon (Sunrise)	10 - 29	29	29 - 50	50	900
Winter squash <sup>4</sup> (Ebisu)	< 25	25	25 – 40	40	1,800 - 2,500

a: for melons b: for winter squash c: 80% of full size

Since the rates of fruit enlargement at the time of harvest are significantly different between cucumber/zucchini and melons/winter squashes, dilution of residue caused by fruit enlargement is also significantly different even if pesticides are applied the same days before harvest. Therefore potential residues may not be similar between cucumber/zucchini and melons/winter squashes.

### 1.2. Content of carbohydrates (including sugar and starch) in fruits

For melons, sugar content of fruits is one of the important factors to determine the quality of fruits. For winter squashes, starch content of fruits is one of the important factors to determine the quality of fruits. It should be noted that these factors are the key determinants of harvest dates for melons and winter squashes. The concentrations of carbohydrate including sugar and starch in cucumbers and zucchini are much lower than those in melons and winter squashes (see Table 3).

<sup>3</sup> Rural Culture Associations Japan. Yasai Engei Daihyakka Vol. 4. Melons and Watermelons, 226, 1989

<sup>4</sup> Akinobu Nagao. Post-harvest physiological change and cooking properties of winter squash fruits (in Japanese), Journal of Cookery Science of Japan, Vol. 28(1), 59-64, 1995  
([https://www.jstage.jst.go.jp/article/cookeryscience1995/28/1/28\\_59/\\_pdf](https://www.jstage.jst.go.jp/article/cookeryscience1995/28/1/28_59/_pdf))

**Table 3. Nutrient composition of fruiting vegetables, cucurbits (Fruit, raw)<sup>5</sup>**

Commodity	per 100g edible portion			
	Water (g)	Protein (g)	Lipid (g)	Carbohydrate (g)
Cucumber ( <i>Cucumis sativus</i> L.)	95.4	1.0	0.1	3.0
Zucchini ( <i>Cucurbita pepo</i> L.)	94.9	1.3	0.1	2.8
Melon ( <i>Cucumis melo</i> L.)	87.8	1.1	0.1	10.3
Watermelon ( <i>Citrullus lanatus</i> )	89.6	0.6	0.1	9.5
Winter squash ( <i>Cucurbita maxima</i> Duchesne)	76.2	1.9	0.3	20.6

## 2. Difference in GAPs (PHIs)

While cucumbers are generally harvested immature every day for a period of some months, winter squashes are harvested at their maturity in a limited period at the end of cultivation. Therefore GAPs of cucumbers and winter squashes in Japan are sometimes different.

PHIs of critical GAPs of pesticides registered in Japan are compared among cucumber, zucchini, melon, watermelon, and winter squash. In total, 120 active ingredients (300 formulated products) are registered in Japan as insecticides or fungicides for foliar spray for either one of the above-mentioned five cucurbit vegetables. For each active ingredient / crop combination, the shortest PHI is selected. The numbers of registered active ingredients for the five cucurbit vegetables with different PHIs (1, 3, 7, 10, or 14-45 days) are shown in Table 4.

The numbers of active ingredients with PHI = 1 day are 100 (97.1%) for cucumber, 18 (85.7%) for zucchini, 68 (70.8%) for melon, 62 (65.3%) for watermelon, and 28 (50.9%) for winter squash. For cucumber and zucchini, while almost all the active ingredients are registered with PHI = 1 day, none of active ingredients are registered with PHI longer than 7 days. The numbers of active ingredients with PHI = 14 - 45 days are 3 (3.1%) for melon, 5 (5.3%) for watermelon, and 9 (16.4%) for winter squash. The number of active ingredients with longer PHIs for winter squash is significantly higher than that of cucumber/zucchini, and is also higher than that of melon/watermelon.

**Table 4. Comparison of PHIs of Japanese cGAPs for Fruiting vegetables, cucurbits**

Crop	No. of Registered Active Ingredients with Different Pre-Harvest Intervals (days)					
	1	3	7	10	14 - 45	Total
Cucumber	100 (97.1%)	2 (1.9%)	1 (1.0%)	-	-	103 (100%)
Zucchini	18 (85.7%)	1 (4.8%)	2 (9.5%)	-	-	21 (100%)
Melon	68 (70.8%)	15 (15.6%)	9 (9.4%)	1 (1.0%)	3 (3.1%)	96 (100%)
Watermelon	62 (65.3%)	15 (15.8%)	13 (13.7%)	-	5 (5.3%)	95 (100%)
Winter squash	28 (50.9%)	8 (14.5%)	10 (18.2%)	-	9 (16.4%)	55 (100%)

With regard to the difference between melons and winter squashes, while melons are generally eaten raw, winter squashes are seldom eaten raw but are commonly eaten after cooking although dietary habits may differ among countries.

In conclusion, in order to facilitate establishing MRLs for subgroups, Japan supports the option 1 which divides Group 011 Fruiting Vegetables, Cucurbits into three subgroups: 011A Cucumber and Summer squashes, 011B Melons, and 011C Winter squashes.

<sup>5</sup> Source: Tables of Food Composition in Japan (2010)

**Kenya****SPECIFIC COMMENTS****OPTION 1 (3 subgroups, supporting comments from Thailand and Japan):**

<b>Subgroup 11A Cucumber and Summer Squash</b>
Balsam apple; Balsam pear (bitter melon); Bottle gourd; Chayote; <b>Chieh qua</b> ; Cucumber; <b>Cucumber, exploding; Cucumber, stuffing</b> ; Gherkin; Gherkin, West Indian; <b>Gourd, bitter snake; Gourd, buffalo; Gourd, Malabar; Gourd, pointed; Gourd, round; Ivy gourd; Japanese snake gourd</b> ; Loofah, angled; Loofah, smooth; Snake gourd; Squash, summer; <b>Tacaco</b>
<b><u>Kenya Comments:</u></b> <i>We have no problem with option one however we would propose the names to be written in full excluding commas in between as follows: Examples 'cucumber exploding; cucumber stuffing; Gherkin west Indian; Gourd bitter snake; Gourd buffalo; Gourd Malabar; Gourd pointed; Gourd round; Loofah angled; Loofah smooth; summer Squash;' for clarity and consistency</i>
<b>Subgroup 11 B Melons</b>
Melons; <b>Melon.Nara</b> ; Watermelon
<b><u>Kenya Comment:</u></b> Kenya is in agreement with the additional fruits, Nara melon
<b>Subgroup 11C. Winter squashes</b>
<b>Casabanana; Chinese cucumber; Cucumber; African horned</b> ; Pumpkins; Wax gourd; Winter squash
<b><u>Comment:</u></b> <i>Kenya is in agreement with the additional fruits in bold</i> <i>Rationale for choosing option 1: they are all having inner edible portion, harvested mature and same behavior in pesticide.</i>

10. The proposal for Group 014 Legume vegetables is shown below. New commodities are shaded.

**OPTION 1 (4 subgroups, supporting comments from Canada and United States of America and similar to both the International Crop Grouping Consulting Committee and the EU System):**

<b>Subgroup 14A. Beans with pods</b>
Black gram (Urd bean); Broad bean (green pods and immature seeds); <b>Catjang (immature pods and green seed)</b> ; Cluster bean (Guar); Common bean (pods and immature seeds); Cowpea (immature pods); Goa bean (immature pods); Hyacinth bean (young pods (Lablab bean (pods))); Jack bean (young pods); Mat bean (green pods) (moth bean (pods)); Mung bean (green pods); Rice bean; Scarlet runner bean (pods) Soya beans (young pods); <b>Stink bean (pods and immature seeds)</b> ; Sword bean; Winged pea; Yard-long bean;
<b><u>Comment</u></b> <i>We are in agreement with the list since the whole group is harvested immature stage and affected by similar pest and disease incidences.</i>
<b>Subgroup 14B. Peas with pods</b>
Garden pea (young pods); <b>Grass pea (young pods)</b> ; Lentil (young pods); Pigeon pea (green pods); Podded pea (young pods)
<b><u>Comment:</u></b> Kenya is in agreement with addition in bold in subgroup 14B



<p><b>Subgroup 14C. Succulent beans without pods</b></p> <p>Bambara groundnut; Broad beans, shelled; <b>Catjang (succulent seeds)</b>; Common bean (succulent seeds); <b>Cowpea (succulent seeds)</b>; <b>Goa bean (succulent seeds)</b>; Hyacinth bean (immature seeds) (lablab bean (succulent seeds)); Jack bean (immature seeds); Lima bean (succulent seeds); Lupin; Mat bean (mature fresh seeds) (moth bean) (fresh seeds)); Soya bean (succulent seeds); <b>Stink bean (succulent seeds)</b>; <b>Velvet bean</b></p> <p><b>Comment:</b>  <b>Kenya is in agreement with addition in bold in subgroup 14C</b></p>
<p><b>Subgroup 14D. Succulent peas without pods</b></p> <p><b>Chickpea (succulent seed)</b>; Garden pea (succulent seeds); <b>Lentil (succulent seeds)</b>; Pigeon pea (young green seeds)</p> <p><b>Comment:</b>  <b>Kenya is in agreement with addition in bold subgroup 14D</b></p> <p><b>Rationale:</b> They have similar production practices and growth habits</p>

### **SPECIFIC COMMENTS**

Kenya is in agreement with recommendation 11, 12 as indicated in option 1 and accepts para13 to submit these Groups to the 38th Session of the Commission for adoption at Step 5.

#### **United States of America**

Regarding Group 011 Fruiting Vegetables, Cucurbits, the United States supports option 2 discussed in CX/PR 15/47/7. While the proposed Codex Cucumber and Summer Squashes subgroup 011A and the Codex Melons subgroup 011B discussed in option 1 are in line with the work of the International Crop Grouping Consulting Committee (ICGCC), the proposed Codex subgroup 011C, Winter squashes appears to be an artificially created group that includes: Pumpkins; Wax gourd; Winter squash. The US does not agree the data provided supports the establishment of this third subgroup and these commodities should be in the Cucumber and Squashes subgroup 011A.

*Basis for Inclusion of Pumpkins; Wax gourd; Winter squash into the Cucumber and Squashes subgroup 011A.* 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 United States 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. 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. Additionally, by creating this third crop group additional residue data on winter squash would be needed. However, the US is of the opinion that residue data for cucumber and summer squash are representative of winter squash without the need for additional data.

The US also does not agree with the proposal in option 3 to divide the cucurbit group into two subgroups based on whether the peel is inedible and edible. The edible portion is only one characteristic to be considered. However, based on a weight of evidence approach winter squash is better suited to be in a squash/cucumber subgroup based on 1) Commodity's similar potential for pesticide residues; 2) Similar production practices and growth habits 3) Similar GAP for pesticide uses and similar pest problems; and 4) Similar residue behavior. Further, since cucumber typically has a shorter pre-harvest interval (PHI) than winter squash it is expected that residues for winter squash would be lower and therefore, cucumber and summer squash data would be protective of the potential residues for winter squash.

Regarding Group 014 Legume vegetables, United States supports option 1 to divide the legume vegetables into four subgroups: 14A Beans with pods; 14B Peas with pods; 14C Succulent beans without pods; and 14D Succulent peas without pods. The US Delegation agrees with the proposal to create the four subgroups and believes this will provide greater flexibility to allow for subgroup MRLs when there are only data for pea or bean but not both commodities.

#### **African Union**

With respect to the options posed, the following is proposed:

##### **A. Subgroup 11: Fruiting vegetables, cucurbits**

AU supports the classification of the 3 groups 11A (Fruiting vegetables, Cucurbits – Cucumbers and Summer squashes), 11B (Fruiting vegetables, Cucurbits – Melons) and 11C (Fruiting vegetables, Cucurbits – Winter squashes) as proposed by EWG, based on similar potential for pesticide residues, commodity morphology, production practice and the edible portion.

##### **B. Subgroup 11: Legume vegetables**

AU supports the classification of the 4 groups for Legume vegetables namely:

14A Legume vegetables - Beans with pods,

14B Legume vegetables - Peas with pods,

14C Legume vegetables - Succulent beans without pods

14D Legume vegetables - Succulent peas without pods as proposed by EWG, based on similarities in potential for pesticide residues, commodity morphology, production practice and the edible portion.