

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 7(a-c)

CX/PR 21/52/6-Add.1

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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REVISION OF THE CLASSIFICATION OF FOOD AND FEED (CXA 4-1989)

(At Step 4)

*Comments at Step 3 of Australia, Canada, Egypt, Iran, Japan, Thailand,
International Federation of Fruit Juice Producers (IFU)*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/37-PR issued in May 2021. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific paragraphs.
2. The comments submitted through the OCS are, hereby attached as an Annex and are presented in table format.
3. This document compiles comments on Agenda Items 7a, b and c.

AGENDA ITEMS 7(a-c)**GENERAL COMMENTS**

COMMENTS/RATIONALE	MEMBER/OBSERVER
Australia has no comments concerning the document presented for comments.	Australia
General Comments on overall structure and content of the revised Class C, Class D, the tables on examples of representative commodities for these classes and the transfer of commodities from Class D to Class C Iran agree with overall structure and content of the revised class C, class D and the table of examples of representative commodities. The transfer of commodities from Class D to Class C is agreed.	Iran

PART I: REVISED CLASS C (CX/PR 21/52/6, Appendix I) (Agenda Item 7a)

I General Comments on overall structure and content of the revised Class C and their readiness for adoption at Step 5 or Step5/8

II Specific Comments

1. Additional commodities for inclusion in the different groups/sub-groups
2. Relocation of commodities within the groups/sub-groups
3. Other comments/issues not covered by the points above

GENERAL/SPECIFIC COMMENTS

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p><u>Revised Class C</u>: Additional commodities for inclusion, relocation of commodities within the groups/ sub-groups. The classification is agreed and sufficient.</p>	Iran
<p>We appreciate the efforts of the USA and the Netherlands as chair and co-chair of the EWG on the revision of the Codex Classification of Food and Animal Feed. In addition, we appreciate that most our comments submitted in October 2020 are reflected in CX/PR 21/52/6. We proposed to amend 'Turnip, fodder' to 'Turnip, hay and/or straw' in Subgroup 052B. We'd like to confirm the reasons why the proposals mentioned above are not reflected.</p>	Japan
<p>Thailand agrees that the structure and content of the revised Class C and their readiness for adoption at Step 5.</p>	Thailand
<p>Additional commodities which are possibly traded should be included in Codex classification in Subgroup 052C: Miscellaneous Processed feed products (such as meal, hulls, dried pulp) as follows; - Sesame, meal Sesamum indicum L. Synonym: Sesamum mulayanum N. C. Nair, Sesamum orientale L. - Mustard oil, meal Brassica juncea Coss; Brassica nigra Koch; Brassica spp.; Sinapis alba L.</p>	Thailand

PART II: REVISED CLASS D (CX/PR 21/52/7, Appendix I) (Agenda Item 7b)

I General Comments on overall structure and content of the revised Class D and their readiness for adoption at Step 5 or Step5/8

II Specific Comments

1. Additional commodities for inclusion in the different groups/sub-groups
2. Relocation of commodities within the groups/sub-groups
3. Recommendation 1: *To include flour commodities not originating from cereals separated from the flour from cereals and to classify them in Class D, Type 13, Group 069 (Miscellaneous derived edible products from plant origin).*
4. Recommendation 2: *To keep Class D, Type 15, Group 078 (Manufactured foods (multi-ingredient) of plant origin), but to classify no commodities in this Group.*
5. Recommendation 3: *To not create groups for wholemeal analogous to groups for flour from cereals.*
6. Recommendation 4: *To rename Class D, Type 13, Group 070 “Fruit juices” into “Fruit and vegetable juices” and to change the introduction text accordingly.*
7. Recommendation 5: *To agree with: (i) the structure, locations of commodities and other changes proposed for Class D, Type 13, Group 066 Teas and (ii) the approach taken for herbal teas to mention the most important ones separately and to cover minor ones under two single codes DT 9999 Leaves and flowers from other crops used for herbal teas, dried and DT 9998 Roots from other crops used for herbal teas, dried.*
8. Recommendation 6: *To agree on the additional new commodities included in Class C*
9. Other comments/issues not covered by the points above

GENERAL/SPECIFIC COMMENTS

COMMENTS/RATIONALE	MEMBER/OBSERVER
<u>Recommendation 6</u> : <i>To agree on the additional new commodities included included in Class C</i> Typo correction.	Canada
<u>Revised Class D</u> : Additional commodities for inclusion, relocation of commodities within the groups/sub-groups and Recommendations 1-6. The classification is agreed and sufficient.	Iran
Republic of Korea (ROK) would like to provide a comment about the circular letter of the revision of the Classification of Food and Feed (Class D) ROK would like to add 1 new commodity in Group 55 (Dried fruits) and 40 new commodities in Group 56 (Dried vegetables) as below. <u>Group 055 Dried fruits</u> New Jujube, Chinese, dried Ziziphus jujuba Mill <u>Group 056 Dried vegetables</u> New Spring onion, dried Allium cepa L., various cultivars, a.o. White Lisbon; White Portugal New Tree onion, dried Allium x proliferum (Moench) Schrad. ex Willd.; Allium x wakegii Araki Syn: A. cepa var. proliferum (Moench) Regel	Republic of Korea

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p>Syn: <i>A. cepa</i> L. var. <i>bulbiferum</i> L.H. Bailey Syn: <i>A. cepa</i> L. var. <i>viviparum</i> (Metz.) Alef. New Welsh onion <i>Allium fistulosum</i> L. New Chinese cabbage, dried, Chinese cabbage (napa), Napa cabbage, Pak-tsai, Kimchi cabbage, dried <i>Brassica rapa</i> L. subsp. <i>pekinensis</i> (Lour.) Hanelt Syn: <i>B. pekinensis</i> (Lour.) Rupr. <i>Brassica rapa</i> L. subsp. <i>pekinensis</i> (Lour.) Hanelt Syn: <i>Brassica rapa</i> L. var. <i>glabra</i> Regel New Barley shoots, dried <i>Hordeum vulgare</i> L. New Chamchwi, dried <i>Doellingeria scabra</i> (Thunb.) Nees Syn: <i>Aster scaber</i> Thunb. New Chamnamul, dried <i>Pimpinella calycina</i> Maxim Syn: <i>Pimpinella brachycarpa</i> (Kom.) Nakai; New Chamssuk, dried <i>Artemisia dubia</i> Wall. Ex DC. New Chard VL, dried <i>Beta vulgaris</i> L. subsp. <i>vulgaris</i> var. <i>vulgaris</i>; <i>Beta vulgaris</i> L. subsp. <i>vulgaris</i> var. <i>cicla</i> New Chili pepper leaves, dried <i>Capsicum annuum</i> L. New Chicory leaves, dried <i>Cichorium intybus</i> L., var. <i>foliosum</i> Hegi New Chrysanthemum, edible leaved, dried <i>Glebionis</i> spp. New Danggwi, dried <i>Angelica gigas</i> Nakai New Dandelion, dried <i>Taraxacum officinale</i> F.H. Wigg. aggr. New Endive, dried <i>Cichorium endivia</i> L. New Godeulppaegi, dried <i>Crepidiastrum sonchifolium</i> (Bunge) Pak & Kawano New Gomchwi, dried <i>Ligularia fischeri</i> Turcz.</p>	

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p>New Glasswort, common, dried Salicornia L. New Japanese honewort, dried Cryptotaenia japonica Hassk New Sanmaneul leaves, dried Allium victorialis L.; Syn: A. ochotense Prokh. A. microdictyon Prokh. New Soya bean leaves, dried Glycine max (L.) Merr. New Seumbagwi, dried Ixeridium dentatum (Thunb.)Tzvelev New Radish leaves (including Radish tops), dried Raphanus sativus L., several varieties New Burdock, greater or edible, dried Arctium lappa L.; Syn: Lappa officinalis All.; L. major Gaertn. New Deodeok, dried Codonopsis lanceolata (Siebold&Zucc.) Trautv. New Kudzu, dried Pueraria lobata (Willd.) Ohwi New Radish, dried Raphanus sativus L. var. sativus New Cassava, dried Manihot esculenta Crantz; Syn: M. aipi Pohl; M. ultissima Pohl; M. dulcis Pax; M. palmata Muell.-Arg. New Sweet potato, dried Ipomoea batatas (L.) Poir New Taro, dried Colocasia esculenta (L.) Schott, var. esculenta New Yacon, dried Smallanthus sonchifolius (Poepp. & Endl.) H. Rob. Syn: Polymnia sonchifolia Poepp. New Yams, dried Dioscorea L.; several species New Lotus tuber, dried Nelumbo nucifera Geartn. New Sweet potato, stems, dried</p>	

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p>Ipomoea batatas (L.) Lam. New Taro stems, dried Colocasia esculenta (L.) Schott New Bamboo shoots, dried Arundinaria spp.; Bambusa spp. including B. blumeana; B. multiplex; B. oldhamii; B. textilis; Chimonobambusa spp.; Dendrocalamus spp., including D. asper; D. beecheyana; D. brandisii; D. giganteus; D. laetiflorus and D. strictus; Gigantochloa spp. including G. albociliata; G. atter; G. levis; G.robusta; Nastus elatus; Phyllostachys spp.; Thyrsostachys siamensis; Thyrsostachys oliverii (Poaceae (alt. Gramineae)) New Dokhwal shoot, dried Aralia continentalis Kitag. New Dureup young shoot, dried Aralia elata (Miq.) Seem. New Eumnamu shoot, dried Kalopanax septemlobus (Thunb.ex A Murr.) Koidz. New Udo, dried Aralia cordata Thunb.</p>	
Thailand agrees that the structure and content of the revised Class D and their readiness for adoption at Step 5.	Thailand
<p>Recommendation 1: <i>To include flour commodities not originating from cereals separated from the flour from cereals and to classify them in Class D, Type 13, Group 069 (Miscellaneous derived edible products from plant origin).</i></p> <p>Thailand supports including flour commodities not originating from cereals separated from the flour from cereals and to classify them in Group 069 (Miscellaneous derived edible products from plant origin).</p>	Thailand
<p>Recommendation 2: <i>To keep Class D, Type 15, Group 078 (Manufactured foods (multi-ingredient) of plant origin), but to classify no commodities in this Group.</i></p> <p>Thailand supports keeping group 078 of Type 15: Manufactured foods (multi-ingredient) of plant origin. Although currently there is no commodity to be classified into this group, it could be useful in the future.</p>	Thailand
<p>Recommendation 3: <i>To not create groups for wholemeal analogous to groups for flour from cereals.</i></p> <p>In our opinion, it is not necessary to create a new subgroup for wholemeal under group 065: cereal milling fraction.</p>	Thailand
<p>Recommendation 4: <i>To rename Class D, Type 13, Group 070 “Fruit juices” into “Fruit and vegetable juices” and to change the introduction text accordingly.</i></p> <p>Thailand does not oppose to rename Group 070 “Fruit juice” into “Fruit and vegetable juices” and to change the introduction text accordingly.</p>	Thailand
<p>Recommendation 6: <i>To agree on the additional new commodities included in Class C</i></p> <p>Thailand does not oppose additional new commodities in Class D</p>	Thailand

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p><u>Agenda Item 7(b): Class D – Processed foods of plant origin. All types in Class D. Proposed groups in different types</u></p> <p>The International Fruit and Vegetable Juice Association (IFU) have the following observations concerning Group D modification for processed products given in CL 2021/37/OCS-PR.</p> <p>1) The preamble for group 70 is reprinted below: “Fruit and vegetable juices, Group 070, are pressed from various mature fruits, either from the whole fruits or from the pulp or from vegetable commodities. A small amount of preserving agent(s) may be added to the juices during processing. The juices are often prepared for international trade in a concentrated form which is reconstituted for wholesale or retail distribution to about the original juice concentration as obtained by the pressing process.”</p> <p>In this preamble it uses some terms that are not in line with the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005). At present there is no Codex Standard for Vegetable Juices that defines this type of product.</p> <p>With regards to the text “either from the whole fruits or from the pulp”: In the CODEX STAN 247-2005 it stipulates that juice is pressed from “the edible part of the fruit”, not from the whole fruit or the pulp, and we would suggest that this text should be used here.</p> <p>With regards to the text “A small amount of preserving agent(s) may be added to the juices during processing”: In CODEX STAN 247-2005 the addition of preservatives are not permitted in this type of product, with the exception of grape juice, and IFU would therefore suggest that this sentence is removed.</p> <p>With regards to the text “to about the original juice concentration as obtained by the pressing process”: In CODEX STAN 247-2005 it stipulates that for juices from concentrate, that are listed in the appendix, should be reconstituted to the values given there and IFU would suggest that this sentence is adjusted accordingly.</p> <p>We suggest the preamble should read as follows: “Fruit and vegetable juices, Group 070, are pressed from the edible part of mature fruits or from vegetable commodities. Juices are often prepared for international trade in a concentrated form, which is reconstituted for wholesale or retail distribution. Fruit juice concentrates should be reconstituted to the relevant provision listed in the appendix of CODEX STAN 247-2005. In processing vegetables, a small amount of preserving agent(s) may be added. Vegetable juice concentrates should be reconstituted to about the original juice concentration as obtained by the pressing process.”</p> <p>2) It is the opinion of IFU that the grouping of all juice products in one class (Group 70) is not ideal. Although these products use similar post processing techniques to liberate the juice from the fruit or vegetable raw agricultural product (RAP), the use of pesticides on the RAP are likely to be different between fruits and vegetables as these are likely to be subject to different pests. Therefore, IFU would suggest that a better group structure might be to split this into two separate groups “fruit juices” and “vegetables juices”.</p> <p>If this is adopted the preamble should be modified as defined below: <u>Fruit juices</u> “Fruit juices, Group 070a, are pressed from the edible part of mature fruits. Juices are often prepared for international trade in a concentrated form, which is reconstituted for wholesale or retail distribution. These products should be reconstituted in line with the relevant provision given in the appendix of the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005).”</p>	<p>IFU</p>

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p><u>Vegetable juices</u></p> <p>“Vegetable juices, Group 070b, are pressed from various vegetable commodities. A small amount of preserving agent(s) may be added to the juices during processing. The juices are often prepared for international trade in a concentrated form which is reconstituted for wholesale or retail distribution. This reconstitution should be made to about the original juice concentration as obtained by the pressing process.”</p> <p>Submitted 23-6-21</p>	

PART III: TRANSFER OF COMMODITIES FROM CLASS D TO CLASS C (CX/PR 21/52/7, Appendix II) (Agenda Item 7b)

I General Comments on the transfer of commodities from Class D to Class C as proposed by the EWG

II Specific Comments

1. Recommendation 7: *To agree with the relocation of commodities from Class D to Class C as shown in Appendix II to CX/PR 21/52/7 and in the revised Class C (CX/PR 21/52/6, Appendix I) and Class D (CX/PR 21/52/7, Appendix I).*
 - a. If there is not support for Recommendation 7, provide comments on how to relocate commodities from Class D to Class C taking into account points 6.2 and 6.5 of CL 2021/37-PR, paragraph 6
2. Classification of meals of oilseeds
3. Other comments/issues not covered by the points above

GENERAL/SPECIFIC COMMENTS

COMMENTS/RATIONALE	MEMBER/OBSERVER
<p>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 D, specifically in relation to the addition of new commodities and the relocation of animal processed commodities from Class D (Processed Food Commodities of Plant Origin) to Class C (Primary Feed Items). Canada concurs with Recommendations 1 to 7 and has no further comments.</p>	Canada
<p><u>Classification of meals of oilseeds</u> Canada is in agreement with moving forward with the classification of Class C and Class D but acknowledging that more work is required to determine the appropriate class for meals of oilseeds. The meal of oilseed crops can be further processed to obtain the higher value amino acids and proteins which make them suitable as a source for nutritional additives in dietary items for human food. However, the quantities of these meals going to feed are huge and even if the meal is further processed to obtain the amino acids and proteins, the leftover meal will still end up as a feed commodity. The likelihood is that most pesticide residues will remain with the leftover meal and not with the isolates. The EWG only considered the processing of “primary food commodities” and the use of oilseed meal for the extraction of amino acids and proteins is outside the scope of this definition.</p>	Canada
<p>Whether there is support for Recommendation 7, i.e. the way the commodities have been relocated from Class D to Class C, if not, please provide comments with their rationale on how to relocate commodities from Class D to Class C. And the outcome of the additional discussion of the classification of meals of oil seeds. We agree with the transfer of commodities from Class D to Class C.</p>	Iran
<p><u>Recommendation 7</u>: <i>To agree with the relocation of commodities from Class D to Class C as shown in Appendix II to CX/PR 21/52/7 and in the revised Class C (CX/PR 21/52/6, Appendix I) and Class D (CX/PR 21/52/7, Appendix I).</i> <u>Comment</u>: Thailand does not agree with the relocation of some commodities from Class D to Class C</p>	Thailand
<p>If there is not support for Recommendation 7, provide comments on how to relocate commodities from Class D to Class C taking into account points 6.2 and 6.5 of CL 2021/37-PR, paragraph 6 <u>Comment</u>: Thailand proposes that soya bean meal should be in Class D. Because soya bean meal was processed for human food such as textured vegetable soy protein.</p>	Thailand

PART IV: TABLES OF REPRESENTATIVE COMMODITIES FOR THE REVISED CLASS C AND CLASS D (CX/PR 21/52/8, Appendices I and II) (Agenda Item 7c)

I General Comments on overall structure and content of the tables on examples of representative commodities for the revised Class C and Class D and their readiness for adoption at Step 5 or Step5/8

II Specific Comments

1. Additional commodities for inclusion in the tables
2. Relocation of commodities within the groups/sub-groups
3. Other comments/issues not covered by the points above

GENERAL/SPECIFIC COMMENTS

COMMENTS/RATIONALE	MEMBER/OBSERVER
As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the development of examples of representative commodities for Class C and Class D. Canada concurs with the representative commodities for Class C and Class D and has no further comments.	Canada
Egypt appreciates the approach taken by CCPR on the revision of the Classification of Food and Feed Class C, Class D and Tables of examples for representative commodities for Class C and Class D (at Step 3). In this regard, we would like to inform you that; Egypt agrees on the above mentioned classification, and recommends to study the addition of classification for Oleoresin Capsicum - Paprika Oleoresin such in case the rest of the other oils listed in the document, through the related EWG.	Egypt
Additional commodities for inclusion, relocation of commodities within the groups/sub-groups. Tables of representative commodities is agreed and sufficient.	Iran
Thailand agrees with overall structure and content of the tables on examples of representative commodities for the revised Class C and Class D	Thailand
In Extrapolation to the following commodities column, Subgroup 051B, Hay of Sorghum grain-type cereals, "Teff,hay; Teff, straw" should be corrected to Teff, hay and/or straw in order to conform with CX/PR 21/52/6 APPENDIX I.	Thailand