

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8c, 8d, 8e, 8f, 8g

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Comments on Agenda Item 8, submitted by China, Colombia, Costa Rica, EL Salvador, European Union, Ghana, Paraguay and Uruguay

Agenda Item 8c: Proposed draft revision of the Classification of Food and Feed at Step 4: Selected vegetable commodity groups (Group 011 - Fruiting vegetables, cucurbits)

China

China appreciates the progress and efforts made by the EWG in the discussion on crop classification.

China agrees Option 3 that Group 011 Fruiting vegetables, cucurbits are divided into 2 subgroups, in which 11A cucumber and summer squash, 11B melons and pumpkins (including winter squash and pumpkins).

Colombia

Colombia tiene el agrado de presentar los siguientes comentarios al documento del asunto: **Anteproyecto de revisión de la Clasificación de alimentos y piensos en el trámite 4: Grupos de hortalizas seleccionadas (Grupo 011 Hortalizas de fruto, cucurbitáceas)**

De acuerdo a la petición del numeral 13, Colombia Apoya la Opción 3: 11A Pepino y calabaza de verano, 11B Melones y calabazas (incluye calabazas de invierno y calabazas) (apéndice I)

Costa Rica

Costa Rica agradece la oportunidad de emitir comentarios; asimismo, felicita a los Estados Unidos de América y los Países Bajos por la labor realizada.

En ese sentido, Costa Rica apoya la opción 3:

11 A: Pepino y Calabaza de Verano (Cucurbitáceas de piel comestible).

11 B: Melones y Calabaza (Cucurbitáceas de piel no comestible).

Ghana

Ghana wishes to commend the effort of the eWG Chaired by the United States of America and Co-chaired by the Netherlands for preparing the Proposed draft revision of the Classification of Food and Feed at Step 4: Selected vegetable commodity groups (Group 011 - Fruiting vegetables, cucurbits). We recall that no agreement was reached at CCPR47 on the grouping of Group 011 Fruiting vegetables, cucurbits. We also note the varied opinions which were expressed during the eWG and commend the eWG for the considerable compromises which have been made.

Position: Ghana supports the compromised solution i.e. option 3, 11A cucumber and summer squash, 11B melons and pumpkins (includes winter squash and pumpkins).

Rationale: The subgroup has similar potential for pesticide residues and similar morphology.

Paraguay

Paraguay apoya la opción 3, presentada como conciliadora, debido a que es más práctica en cuanto a la agrupación de productos, y los divide en cucurbitáceas con piel comestible (11 A) y con piel no comestible (11 B)

Agenda Item 8d: Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 020 – Grasses of cereal grains)**China**

China appreciates the progress and efforts made by the EWG in the discussion on crop classification.

China agrees that Group 020 Grasses of cereal grains are divided into 5 subgroups, suggested by Canada. China suggests adding the commodity of Avena nuda L. (English name: sweet oat, Hulless Oat or Naked Oat) into subgroup 020A wheat, similar grains and pseudo-cereals.

Colombia

De acuerdo a la petición del numeral 10, Colombia Apoya la propuesta 2 de compromiso del Japón:

Subgrupo 20A. Trigo, granos similares y pseudocereales sin vainas (trigo como producto representativo)
Subgrupo 20B. Cebada, granos similares y pseudocereales con vainas (cebada como producto representativo)
Subgrupo 20C. Cereales de arroz (arroz como producto representativo)
Subgrupo 20D. Maíz, sorgo y mijo en grano (maíz y sorgo o mijo como producto representativo)
Subgrupo 20E. Cereales de maíz dulce (maíz dulce como producto representativo)

Costa Rica

Costa Rica agradece la oportunidad de emitir comentarios; asimismo, felicita a los Estados Unidos de América y los Países Bajos por la labor realizada.

Costa Rica ratifica su apoyo a la clasificación de un mínimo de grupos; En ese sentido, apoya la propuesta planteada por Canadá.

EL Salvador

El Salvador apoya la Propuesta compromiso de Canadá, porque se considera que es la que se ajusta a nuestras condiciones:

Subgrupo 20A. Código GC 2086 Trigo, granos similares y pseudocereales
Subgrupo 20B. Código GC 2087 Cebada, granos similares
Subgrupo 20C. Código GC 2088 Cereales de arroz
Subgrupo 20D. Código GC 2089 Maíz, sorgo y mijo en grano
Subgrupo 20E. Código GC 2090 Cereales de maíz dulce

European Union*European Union Competence**European Union Vote*

The European Union (EU) would like to thank the Electronic Working Group led by the United States of America and co-chaired by the Netherlands for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds, in particular for the crop group 020 – Grasses of cereal grains.

The EU contributed to the Electronic Working Group with a comprehensive reply, supported by data, giving the rationale for its position. The EU is grateful that elements of this have been taken into account and welcomes the Canadian and Japanese compromise proposals, both setting out five subgroups as a step forward.

The EU in particular welcomes that wheat and barley have been clearly separated, as it was demonstrated by the data collected by the EU. This is necessary in order to take into account the different residue levels and behaviour of the two crops.

The EU is still not in favour of merging the group of pseudocereals with the groups "wheat" or "barley". We believe that it would be more appropriate to keep the pseudocereals in a different group, given the differences in cultivation practices, yield, residues behaviour and levels.

Paraguay

Paraguay cree conveniente la clasificación en grupos aparte a los pseudocereales con cascara y sin cascara, además de tener un grupo por separado para maíz dulce (incluido maíz choclo). Por lo tanto con respecto al documento de referencia apoyamos la propuesta de agrupación planteada por el Japón

Agenda Item 8e: Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 021 - Grasses for sugars or syrup production)

China

China suggests adding the commodity of sugar beet in Group 021, although it is included in 16A. For sugar beet in China is mainly used to sugar-making. It might be listed in 021B Other plants for syrup production.

Colombia

De acuerdo a la petición del numeral 6, Colombia apoya la Propuesta de la Unión Europea:

- (1) Raíces de remolacha azucarera [se observa que remolacha azucarera figura ya en 016 Raíces y tubérculos],
- (2) Hojas y cañas [hojas de agave, sorgo dulce],
- (3) Raíces [raíces de polipodio común, raíces de yacón], y
- (4) Otros [jarabe de savia de tronco incluyendo abedules, fresnos del maná, arces y palmeras].

Se debe retirar el grupo 1 de raíces porque se repite en el grupo 3. Sin embargo Colombia presenta gran inquietud ante el grupo otros que puede hacer muy amplia esta agrupación.

Costa Rica

Costa Rica agradece la oportunidad brindada para emitir comentarios y manifiesta su apoyo a la propuesta de documento planteada por el grupo de trabajo.

EL Salvador

El Salvador está de acuerdo con la propuesta del Grupo de Trabajo electrónico. La justificación es debido a que los plaguicidas aplicados para las gramíneas son diferentes a los aplicados a los tubérculos, raíces, árboles de savia y hojas de agave que se mencionan en la propuesta.

Grupo 021	Gramíneas para la producción de azúcares o de jarabe
Código n.	Producto
GS 0658	Sorgo, dulce Variedades y cultivares de sorgo cuyos tallos contienen cantidades considerables de zumo (jugo) dulce. Entre otros, cultivares de Sorghum bicolor (L.) Moench. S. dochna (Forsk.) Snowden
GS 0659	Caña de azúcar Saccharum officinarum L.

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group led by the United States of America and co-chaired by the Netherlands for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds, in particular for the crop group 021 – Grasses for sugar or syrup production.

The EU classification of the sugar producing plants differs quite substantially from both the actual Codex classification and from the recommendation in document CX/PR 16/48/10.

While in the Codex classification only the sugar producing grasses are considered, the EU classification considers a wider range of sugar producing plants, classified in subgroups depending on the part of the plant from which the sugar (or syrup) is obtained.

The EU is open to discuss the different options in more detail and would like to suggest that the electronic working group further examines whether a wider range of sugar producing plants should be considered before taking a final decision. In these considerations an evaluation according to the seven criteria set out in Appendix III to document CX/PR/16/48/10 is needed.

Ghana

Position: Ghana welcomes the work of the EWG on the proposed classification of grasses for sugar and syrup production under “sorgo or sorghum and sugar cane”. Ghana could support the addition of the “Others” subgroup under the EU proposal and therefore looks forward to further discussing this subject.

Paraguay

Paraguay apoya la propuesta para el Grupo 021 – Gramíneas para la producción de azúcares o de jarabe, y Grupo 024 – Semillas para bebidas y dulces.

Agenda Item 8f: Proposed draft revision of the Classification of Food and Feed at Step 4: Selected commodity groups (Group 024 - Seeds for beverages and sweets)

China

China suggests adding three commodities in Group 024 Seeds for beverages and sweets.

Colombia

Colombia tiene el agrado de presentar los siguientes comentarios al documento del asunto: **Anteproyecto de revisión de la Clasificación de alimentos y piensos en el trámite 4: Grupos de productos seleccionados (Grupo 024 – Semillas para bebidas y dulces)**

De acuerdo a la petición del numeral 7, Colombia apoya la propuesta de inclusión de semillas de Albahaca y el avance del documento con la propuesta del GTE, correspondiente al apéndice (I)

Costa Rica

Costa Rica desea felicitar a los Estados Unidos de América y los Países Bajos, por el avance en el contenido del documento; asimismo, apoya la recomendación para examinar la sub agrupación y los nuevos productos para el Grupo 024 – Semillas para bebidas y dulces con miras a su adopción en el Trámite 5 por el 39.º período de sesiones de la Comisión del Codex Alimentarius.

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group led by the United States of America and co-chaired by the Netherlands for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds, in particular for the crop group 024 – Seeds for beverages and sweets.

The EU classification of the plants used for the production of beverages and sweets differs quite substantially from both the actual Codex classification and from the recommended classification in document CX/PR 16/48/11.

While in the Codex classification system only the seeds used for the production of beverages and sweets are considered, the EU classification considers a wider range of plants used for the production of beverages and sweets.

The EU is open to discuss the different options in more detail and would like to suggest that the electronic working group further examines whether a wider range of plants used for the production of beverages and sweets should be considered before taking a final decision. In these considerations an evaluation according to the seven criteria set out in Appendix III to document CX/PR/16/48/11 is needed.

In evaluating these options, the EU believes that listing commodities in several groups should be avoided as this will create confusion. In making a choice, the main purpose of use of a commodity should be considered. Therefore the EU would prefer to keep sunflower and canola seeds in the group of oilseeds (current classification) and not to move them to group 024 as was proposed by New Zealand.

The EU could however support the request from India to introduce the commodity *basil seeds* in the group 024, as it is used to produce a refreshing beverage and it is not listed in any other CODEX group.

Ghana

Position: Ghana supports the introduction of the new commodity group “seeds for beverages and sweets” (Group 024).

Rationale: The creation of the new commodity group will facilitate the elaboration of MRLs for these commodities.

Agenda Item 8g: Proposed draft Table 2 -Examples of selection of representative commodities (vegetable and other commodity groups) (for inclusion in the Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides to commodity groups) at Step 4

Colombia

De acuerdo a la petición del numeral 5, Colombia solicita que en espera de la definición de los grupos 014, 015, 011, 020, 021, 024; y para una mejor revisión de los mismos, el anteproyecto no pase a trámite acelerado.

Costa Rica

Costa Rica agradece la oportunidad brindada para emitir comentarios y manifiesta su apoyo a la propuesta de documento planteada por el grupo de trabajo.

EL Salvador

El Salvador está de acuerdo con los cuadros 2 (Grupo de Hortalizas) y 3 (Gramíneas) y se apoya el avance al trámite 5 para adopción en la CAC.

En el país tenemos especial interés en incluir dos cultivos y hacemos la consulta sobre ¿en cuál de estos se pueden incluir?, nuestro objetivo es poder extrapolar los LMR:

- 1- *Fernaldiapandurata* (flor comestible)
- 2- *Crotalaria longirostrata*

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group led by the United States of America and co-chaired by the Netherlands for the preparation of the proposed draft tables 2 and 3 – Examples of selection of representative commodities (vegetable and other commodity groups).

The EU extrapolation rules allow the replacement of trials of 'beans' commodities (with pods, without pods, dry (pulses)) with trials of 'peas' commodities (with pods, without pods, dry (pulses), and vice versa.

Therefore, the EU would like to propose to indicate in the second column of Table 2, in both the groups 14 and 15, the 'beans' commodities (with pods, without pods, dry (pulses)) as alternative representative commodities to the 'peas' commodities (with pods, without pods, dry (pulses), and vice versa.

The EU would like to underline that this approach is partially already applied in document CX/PR 16/48/12, but only to the subgroup 14B and to the group 15. EU proposes to use the same approach for all subgroups of the two groups 14 and 15.

In details, the EU would suggest the following changes in **Table 2**:

- Line 25: Group 14 Legume vegetables, second column: "*(Garden pea or podded pea)*" should be replaced by *(Pisum spp.)*.
- Line 25: Group 14 Legume vegetables, second column: "*and/or Succulent peas without pods (Pisum spp.)*" should be added.
- Line 25: Group 14 Legume vegetables, second column: "*and Garden pea*" should be replaced by "*and Bambara groundnut*".
- Line 25: Group 14 Legume vegetables, third column: "*Ben moringa*" and "*Peanut (immature)*" should be added.
- Line 26: Group 14A Beans with pods, second column: "*and/or Peas with pods (Pisum spp.)*" should be added.
- Line 27: Group 14 Legume vegetables, second column: "*(Garden pea or podded pea)*" should be replaced by *(Pisum spp.)*.
- Line 27: Group 14B Peas with pods, third column: "*Chi-pea*" should be corrected in "*Chick-pea*".
- Line 28: Group 14C Succulent beans without pods, second column: "*and/or Succulent peas without pods (Pisum spp.)*" should be added.
- Line 29: Subgroup 14D Succulent peas without pods, second column: "*Garden pea*" should be deleted.
- Line 29: Subgroup 14D Succulent peas without pods, second column: "*Succulent peas without pods (Pisum spp.) and/or Succulent beans without pods (Phaseolus spp.)*" should be added
- Line 30: Subgroup 14E Underground beans and peas, second column: the EU agrees to choose "*Bambara groundnut*" as example of representative commodities.
- Line 31: Group 15 Pulses, second column: "*and Bambara groundnut*" should be added.
- Line 34: Subgroup 15C Dry underground legumes, second column: "*Bambara groundnut*" should be added as example of representative commodities.

Taking into consideration the suggestions listed above, the Table 2 for the groups 14 ad 15 would look as follows (the changes to document CX/PR 16/48/12 are highlighted in yellow):

25	Group 14 Legume vegetables	Beans with pods (<i>Phaseolus</i> spp.) and/or Peas with pods (<i>Pisum spp.</i>)(Garden pea or podded pea) and	<u>Legume vegetables (VP 0060):</u> Beans (<i>Phaseolus</i> spp.); Beans (<i>Vigna</i> spp.); Beans, shelled (<i>Phaseolus</i> spp.); Beans, shelled (<i>Vigna</i> spp.); Ben Moringa; Bambara groundnut; Broad bean; Catjang; Chick-pea;
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		Succulent beans without pods (<i>Phaseolus</i> spp.) and/or Succulent peas without pods (<i>Pisum</i> spp.) and Garden pea and Bambara groundnut	Common bean; Cowpea; Garden pea; Goa bean; Grass pea; Guar; Jack bean; Lablab bean; Lentil; Lima bean; Lupin; Moth bean; Mung bean; Peanut (immature); Peas; Peas, shelled; Pigeon pea; Podded pea; Rice bean; Scarlet runner bean; Soya bean; Stink bean; Sword bean; Urd bean; Velvet bean; Winged pea; Yard-long bean
26	Subgroup 14A Beans with pods	Beans with pods (<i>Phaseolus</i> spp.) and/or Peas with pods (<i>Pisum</i> spp.)	Beans with pods (VP 2060): Beans (<i>Phaseolus</i> spp.); Beans (<i>Vigna</i> spp.); Broad bean; Catjang; Common bean; Cowpea; Goa bean; Guar; Jack bean; Lablab bean; Moth bean; Mung bean; Rice bean; Scarlet runner bean; Soya bean; Stink bean; Sword bean; Urd bean; Yard-long bean
27	Subgroup 14B Peas with pods	Peas with pods (<i>Pisum</i> spp.)-(Garden pea or podded pea) and/or Beans with pods (<i>Phaseolus</i> spp.)	Peas with pods (VP 2061): Peas; Ben Moringa; Chick-pea; Garden pea; Grass pea; Lentil; Pigeon pea; Podded pea; Winged pea
28	Subgroup 14C Succulent beans without pods	Succulent beans without pods (<i>Phaseolus</i> spp.) and/or Succulent peas without pods (<i>Pisum</i> spp.)	Succulent beans without pods (VP 2062): Beans, shelled (<i>Phaseolus</i> spp.); Beans, shelled (<i>Vigna</i> spp.); Broad bean, shelled; Catjang; Common bean; Cowpea; Goa bean; Jack bean; Lablab bean; Lima bean; Lupin; Moth bean; Scarlet runner bean; Soya bean; Stink bean; Velvet 29bean
29	Subgroup 14D Succulent peas without pods	Garden pea Succulent peas without pods (<i>Pisum</i> spp.) and/or Succulent beans without pods (<i>Phaseolus</i> spp.)	Succulent peas without pods (VP 2063): Peas, shelled; Chick-pea; Garden pea; Lentil; Pigeon pea
30	Subgroup 14E Underground beans and peas	Bambara groundnut	Underground beans and peas (VP 2064): Bambara groundnut; Peanut (immature)
31	Group 15 Pulses	Beans (<i>Phaseolus</i> spp.) (dry) and/or Peas (dry) (<i>Pisum</i> spp.) and Soya bean, dry and Bambara groundnut	Pulses (VD 0070): Beans (<i>Phaseolus</i> spp.); Beans (<i>Vigna</i> spp.); Adzuki bean; African yam bean; Bambara groundnut; Broad bean; Chick-pea; Common bean; Cowpea; Field pea; Goa bean; Grass-pea; Guar; Horse gram; Jack bean; Kersting's groundnut; Lablab bean; Lentil; Lima bean; Lupin; Morama bean; Moth bean; Mung bean; Peas; Pigeon pea; Rice bean; Scarlet runner bean; Soya bean; Tepary bean; Urd bean; Velvet bean; Winged pea

32	Subgroup 15A Dry beans	Beans (<i>Phaseolus</i> spp.) (dry) and/or Peas (dry) (<i>Pisum</i> spp.) and Soya bean, dry	<u>Dry beans (VD 2065):</u> Beans (<i>Phaseolus</i> spp.); Beans (<i>Vigna</i> spp.); Adzuki bean; African yam bean; Broad bean; Common bean; Cowpea; Goa bean; Guar; Horse gram; Jack bean; Lablab bean; Lima bean; Lupin; Morama bean; Moth bean; Mung bean; Rice bean; Scarlet runner bean; Soya bean; Tepary bean; Urd bean; Velvet bean; Winged pea
33	Subgroup 15B Dry peas	Peas (dry) (<i>Pisum</i> spp.) and/or Beans (<i>Phaseolus</i> spp.) (dry)	<u>Dry peas (VD 2066):</u> Peas; Chick-pea; Field pea; Grass-pea; Lentil; Pigeon pea
34	Subgroup 15C Dry underground legumes	Bambara groundnut	<u>Dry underground legumes (VD 2067):</u> Bambara groundnut; Kersting's groundnut

The EU would like to make also the following specific comment to **Table 3**:

- Line 7, 8, 9: Group 021 Grasses for sugar production and grasses and other plants for syrup production. The three lines under this group make reference to a division of the group into two subgroups ("*sugar cane*" and "*Any crop belonging to GC...*") which does not correspond to the proposal of classification of the group 021, as it is presented in CX/PR 16/48/10.

Finally, the EU would like also to note that the lines of the representative commodities of the group 024 'Seeds for beverage and sweets' are missing. These lines should be included in a new **Table 4**, covering the representative commodities for the Type 4: "Nuts and seeds", which has not yet been provided.

Ghana

Position: We agree with the proposed changes reflected in Table 2 and Table 3.

Rationale: The tables reflect Ghana's position as articulated on agenda item 8(a,b,c,e and f).