



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

50th Session

Haikou, PR. China, 9 - 14 April 2018

Comments at Agenda Item 7(d) submitted by Australia, Canada, Egypt, European Union, Kenya, Republic of Korea and United States of America.

**REVISION OF THE CLASSIFICATION OF FOOD AND FEED:
CLASS C – PRIMARY FEED COMMODITIES
TYPE 11 – PRIMARY FEED COMMODITIES OF PLANT ORIGIN
Group 050 - Legume feeds
Group 051 - Straw, fodder and forage of cereal grains
Group 052 - Miscellaneous fodder and forage crops**

Australia

Australia notes that the 38CCPR agreed not to establish CXLs for fresh forage commodities because they are not traded internationally. Australia supports the decision taken by the 38CCPR but considers it worthwhile for the Codex Classification to include fresh forage commodities so that Members may continue to use the Codex commodity codes to describe such commodities at a national level.

The proposed primary feed commodity list has been revised to replace the general term “fodder” with specific terms, such as “hay”, “straw” and “silage”. Australia remains in favour of the general term of fodder that provides coverage for a greater range of commodities noting that fodder MRLs are not directly related to consumer safety but are trading standard. There are currently over 20 Codex CXLs for AS 0081 Straw and fodder (dry) of cereal grains, plus MRLs for other similar iterations including fodder. Australia seeks clarification about what may happen to the existing Codex CXL for fodder.

Canada

BACKGROUND

At CCPR49 (2017), the Electronic Working Group (EWG) on the Revision of the Classification by CCPR49 (2017) was told to consider the revision of Class C Primary feed commodities, which includes Group 050 (Legume feed), Group 051 (Straw, fodder and forage of cereal grains), and Group 052 (Miscellaneous fodder and forage crops).

CURRENT STATUS

The EWG has recommended additional feed commodities for Groups 050, 051, and 052. There was some support in the EWG to delete forage commodities as they are not traded internationally. However since residues in forage commodities are used to calculate livestock dietary burdens it was decided to keep forage commodities in the Classification.

Codex members and observers have been asked to provide comments on the proposed draft revised Groups 050, 051, and 052 as presented in Appendix I of CX/PR 18/50/9. In particular, comments should consider:

- 1) The use of more specific commodity terms (hay, straw, and silage) to replace the “fodder” terminology used previously.
- 2) The proposal by the EU to create another group within Class C (Primary Animal Feed Commodities) for processed animal feeds and by-products or if these could be incorporated in the existing Classification.

The EWG is recommending that the Committee should forward the revised groups 050, 051, and 052 to CAC41 (2018) for adoption at Step 5.

Canada’s Position on the Revised Legume Feeds (Group 050), Straw, Fodder, and Forage of Cereal Grains (Group 051), and Miscellaneous Fodder and Forage Crops (Group 052)

- As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the revisions of Class C Primary Animal Feed Commodities.
- Canada is in agreement with the revisions to Group 050 Legume feeds, Group 051 Straw, fodder, and forage of cereal grains, and Group 052 miscellaneous fodder and forage crops as described in Appendix I of CX/PR 18/50/9, with the following comments:
 - Canada is in agreement to use more specific commodity terms (hay, straw, and silage) to replace the previously used “fodder” terminology.
 - Regarding the EU’s proposal to create another group within Class C (Primary Animal Feed Commodities) for processed animal feeds and by-products, Canada notes that Class D Processed Foods of Plant Origin, contains group 071 “By-products, used for animal feeding purposes, derived from fruit and vegetable processing” which contains commodities that are processed animal feeds. Therefore, a new group does not need to be created in Class C but Group 071 could be relocated from Class D to Class C to better reflect the commodities within each class

Egypt

Egypt agrees on the classification mentioned in Document no. CI 2018/14-PR related to:

Revision of the Classification of Food and Feed (CXM 4-1989) Class C – Primary Feed Commodities Type 11 – Primary Feed Commodities of Plant Origin

- Group 50 Legume feed;
- Group 51 Straw, fodder and forage of cereal grains; and
- Group 52 Miscellaneous fodder and forage crops

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) on the revision of the Classification of food and feed chaired by the United States of America and co-chaired by the Netherlands for the preparation of the proposed draft on the revision of the Codex Classification of Foods and Animal Feeds.

The EU welcomes the start of the revision of the Class C: 'Primary animal feed commodities' and is pleased that its comments presented to the eWG have been taken into consideration in the document CX/PR 18/50/9. The EU confirms its support for:

- maintaining the forage commodities in the Codex Classification, even in case they are not traded (point 3 of CX/PR 18/50/9);
- replacing the generic term *fodder* with more specific commodity descriptors (hay or straw) (point 7 of CX/PR 18/50/9);
- dividing processed feed products and by-products of the food industry (pomace, pulp, molasses meal, cannery waste and similar) into separate groups (point 8 of CX/PR 18/50/9).

The EU would like to submit the following new comments on the document CX/PR 18/50/9:

- The numbering of the feed groups is not in line with the general lines followed for Class A. There are two groups with the number 051 and two with the number 052; two different letter codes are used in group 051 (AF/AS) and in group 052 (AV/AM).
- The difference between high water content products (forage) and low water content products (hay or straw) is properly reflected in the two groups 051 'Straw, fodder and forage of cereal grains and grasses (including buckwheat fodder)' and in the two groups 052 'Miscellaneous fodder and forage crops', but not in the group 050 'Legume animal feeds'.
- For processed feed products a new Class: 'Processed Feed of Plant Origin' will be the more correct option. However this solution would have a consequence on the numbering of all groups of the classification. An easier alternative is proposed, by creating a subgroup C for processed products, within each feed products group.

Taking into consideration the above comments, the following numbering and naming of the feed products is proposed:

CLASS C: ANIMAL FEED COMMODITIES

Type 11 Feed commodities of plant origin

Group 50 Legume feed products

- Subgroup 050A: products with high water content (forage)
- Subgroup 050B: products with low water content (hay)
- Subgroup 050C: processed products (like silage, meal, hulls)

Group 51 Cereal grains and grasses (including pseudocereals) feed products

- Subgroup 051A: products with high water content (forage)
- Subgroup 051B: products with low water content (hay, straw)
- Subgroup 051C: processed products (like silage, bran, hulls)

Group 52 Miscellaneous feed products

- Subgroup 052A: products with high water content (forage, beets, tops)
- Subgroup 052B: products with low water content (hay)
- Subgroup 052C: processed products like processing residues (meal, hulls, dried pulps), molasses)

The EU would like to submit further minor comments to document CX/PR 18/50/9:

- the explanatory note describing the terms *forage* and *fodder*, at the moment placed at the end of the Group 051, is extremely important for the understanding of the classification of both the groups 051 and 052. It could be better put upfront into the initial description of the group 051, where at the moment it is only indirectly mentioned by a reference 'see explanatory note below'.
- the exact nature of the commodity AS XXXX 'maize *stover*' in Group 051 is unclear. It is suggested to use it as a reference to a new commodity 'maize *straw*', as it has been done for other cereals.

Kenya

Position: Kenya supports the proposal to replace the term *fodder* with a more specific term such as hay, straw and silage. We also support the proposal to create a group in class c that would include processed feed commodities of plant origin, such as pomace, pulps, molasses, meal, cannery waste. We seek further clarification of the term "by product" that has been included.

Rationale: the proposed changes are in line with the current practices for setting MRLs for most of these commodities traded as primary feed commodities of plant origin. "by products" should be clearly defined to determine the commodities to be included under this proposed subgroup.

Republic of Korea

Barley

Barley is included in the group 051 because it is commonly used as a livestock feed in the form of dried straw. In South Korea, whole barley crop, which contains both ears, leaves and stems, is harvested at the early stage of the yellow ripe stage. The whole barley crop harvested at this time is generally green, so is called "green whole barley" in South Korea (Chung bo ri in Korean). This whole barley crop is mainly fed to beef cattle. (see the following photographs).



- Supporting information: culture, harvest and feeding of whole barley crop,

For that reason, we suggest to add Whole barley crop in the group 051 primary feed commodities of plant origin.

APPENDIX 1

Type 11. Primary feed commodities of plant origin

Group 051: Straw, fodder and forage of cereal grains and grasses, except grasses for sugar production (including buckwheat fodder)

AS XXXX. Whole Barley crop (Green)

Hordeum vulgare L.

Italian ryegrass (IRG)

Italian ryegrass (IRG) is a gramineae crop with an annual and a biennial. IRG has high nutritional value and palatability as livestock feed. In South Korea, IRG is harvested at the heading date, and then it is dried in the field for 2~3 days. The dried IRG is packaged in the form of a packed silage with approximate 40% moisture. This IRG is mainly fed to beef cattle. (see the following photographs).



- Supporting information: culture, harvest and feeding of Italian Ryegrass

For that reason, we suggest to add Italian Ryegrass in the group 051 primary feed commodities of plant origin.

APPENDIX 1

Type 11. Primary feed commodities of plant origin

Group 051: Straw, fodder and forage of cereal grains and grasses, except grasses for sugar production (including buckwheat fodder)

AS XXXX. Italian Ryegrass (silage)

Lolium multiflorum

Rice straw

Rice straw is included in the group 051 because it is commonly used as a livestock feed in the form of dried straw. In South Korea, whole crop rice, which contain ears, leaves and stems, is harvested at 30 days after heading date, and is processed in form of a silage. Whole crop rice is called “Chong Che Byeo” in South Korea. This whole crop rice is mainly fed to beef cattle. (see the following photographs).



- Supporting information: culture, harvest and feeding of whole rice crop,

For that reason, we suggest to add Whole crop rice in the group 051 primary feed commodities of plant origin.

APPENDIX 1

Type 11. Primary feed commodities of plant origin

Group 051: Straw, fodder and forage of cereal grains and grasses, except grasses for sugar production (including buckwheat fodder)

AS XXXX. Whole crop rice (silage)

Oryza sativa L.

APPENDIX 1

Type 11. Primary feed commodities of plant origin

Group 051: Straw, fodder and forage of cereal grains and grasses, except grasses for sugar production (including buckwheat fodder)

AS XXXX. Whole Rice crop (silage)

Oryza sativa L.

AS XXXX. Whole Barley crop (silage)

Hordeum vulgare L.

AS XXXX. Italian Ryegrass (silage)

Lolium multiflorum

United States of America**General Comments**

In recent years, the Codex Committee on Pesticide Residues (CCPR) has agreed to revise all of the crop groups in the Food and Animal Feeds Classification. The request for comments in this CL covers a part of this ongoing effort. The United States has co-chaired or chaired the electronic Working Group from the start of this effort, has provided much of the documentation for the proposed crop groups, and strongly supports this project.

Specific Comments

The United States supports the replacement of the general descriptor "fodder" with more specific terms such as "hay", "straw", and "silage" to provide a better understanding and specificity of animal feed commodities in Class C, Type 11.