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CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 7(a) **CX/PR 19/51/6-Add.1**
March 2019

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

51st Session
Macao SAR, P.R. China, 8-13 April 2019

REVISION OF THE CLASSIFICATION OF FOOD AND FEED: CLASS C: PRIMARY ANIMAL FEED COMMODITIES (AT STEP 4)

Comments submitted at Step3 in reply to CL 2019/01-PR by Australia, Canada, China, Egypt and Ghana

Australia

Australia is pleased to submit the following comments in response to circular letters regarding the revision of the classification of food and feed.

CL 2019/01-PR Revision of the Classification of Food and Feed (CXM 4-1989) Class C: Primary Animal Feed Commodities. Request for comments at Step 3.

Australia notes the use of the AL designation for all legume animal feeds with high water content (forage) and low water content (hay) appears to over complicate the classification. It is suggested that the working group consider keeping the numerical codes consistent between hay and forage for the same commodity and use different letter codes as have been applied for Group 052, e.g., LV (legume forage) and LM (legume hay).

Page 5 and 6 of CX/PR 19/51/6

Australia requests the following be added to Subgroup 050A; Products of legume feeds with high water content (forage):

AL 0560 **Adzuki bean, forage**, See Bean, forage AL 3350

Pigeon pea, forage

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Australia requests the following be added to Subgroup 050B; Products of legume feeds with low water content (hay):

Adzuki bean, hay, See Bean, hay AL 3363

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There appears to be a typographical error as there are repeated references to “See Bean, hay AL 3363”. However, AL 3363 relates to Trefoil, forage, AL 3364 is the code for Bean, hay.

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Australia requests the addition of rape seed forage to Subgroup 052A; Products with high water content (forage, beet tops):

AV 0495 **Rape seed, forage**, *Brassica napus* L.

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Australia requests the addition of rape seed hay to Subgroup 052B; Products with low water content (hay)

AM 0495 **Rape seed, hay,** *Brassica napus* L.

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The name for the subgroup AM 3309 “Subgroup of processed products of miscellaneous hay and forage crops (such as meal, hulls, dried pulp, molasses)” is inappropriate because almond hulls and numerous other commodities included in the subgroup are not derived from a hay or forage crop. Perhaps a better title would be:

AM 3309 “**Subgroup of processed products of miscellaneous crops (such as meal, hulls, dried pulp, molasses)**”

Australia notes that several commodities in the OECD Feed Calculator used by JMPR to estimate dietary burdens for livestock are not listed in the classification. The OECD feed calculator was developed following an extensive survey of commodities that are fed. Certainly many of the listed commodities are traded in significant amounts as the meals are sufficiently dry to have reasonable shelf life e.g. Palm kernel meal, about 5.5 million tonnes exported from Indonesia/Malaysia mostly to EU and NZ.

Australia considers the following products should be added to the list of animal feed commodities:

Feed commodity	**Comment/potential subgroup**
Brewer’s grain	Group 052 subgroup AM 3309 or Group 065
Coconut meal	Group 052 subgroup AM 3309
Corn aspirated grain fractions	Group 065
Corn hominy meal = blend of corn bran, endosperm and corn germ produced during corn milling	Group 065
Corn gluten	Group 065
Corn gluten meal	Group 065
Dried distiller’s grain	Group 052 subgroup AM 3309 or Group 065
Flaxseed /linseed meal	Group 052 subgroup AM 3309
Hemicellulose extract (wood molasses)	
Lupin seed meal	Group 052 subgroup AM 3309
Maize germ meal	Group 065
Oat bran/Oat hulls	Group 059 and 065
Palm kernel meal (cake, pellets, expeller)	Group 052 subgroup AM 3309
Peanut meal	Group 052 subgroup AM 3309
Rape (Canola) seed, hulls	Group 052 subgroup AM 3309
Rape (Canola) seed, meal	Group 052 subgroup AM 3309
Sesame seed, meal	Group 052 subgroup AM 3309
Safflower seed, meal	Group 052 subgroup AM 3309
Sorghum aspirated grain fractions	Group 065
Sugarcane bagasse = dry pulpy fibrous residue that remains after sugarcane stalks are crushed to extract their juice	Group 052 subgroup AM 3309
Tomato pomace	Group 052 subgroup AM 3309
Wheat aspirated grain fractions	Group 065
Wheat gluten meal	Group 065

The FAO hosts a resource Feedipedia that contains a description for different feed items (https://www.feedipedia.org/). Information regarding all of the feeds tabulated above, except lupin meal, is available from the web site. Australian sources describe lupin meal as a product consisting of lupin hulls and particles of lupin kernel, which is a highly digestible stock feed averaging 17% protein. While used as a feed ingredient for ruminants, pigs and poultry, lupin meal is increasingly being used in aquaculture.

Annex 1 contains a description of the various feeds in the form of selected text copied from Feedipedia. Additional information on corn/maize meals was sourced from the official publication of the Association of American Feed Control Officials (AAFCO).

Annex 1

Brewer's grain (Brewers grains, brewer's grain, wet brewer's grains, dried brewer's grains, brewer's spent grain)

(Barley = Hordeum vulgare L. ; Rice = Oryza sativa L. ; sorghum = Sorghum bicolor (L.) Moench ; Wheat = Triticum spp. ; Corn/maize = Zea mays L. [Poaceae])

Brewers grains are the solid residue left after the processing of germinated and dried cereal grains (malt) for the production of beer and other malt products (malt extracts and malt vinegar). Though barley is the main grain used for brewing, beers are also made from wheat, maize, rice, sorghum and millet. In the brewing process, grains are soaked in water until they germinate and then dried to produce the malt (malting). The malted grains are milled and steeped in hot water so that enzymes transform the starch into sugars (mashing/saccharification). The resulting sugar-rich liquid (wort) is then boiled, filtered and fermented to produce beer. Brewer's grains are collected at the end of the mashing process, once all sugars have been removed from the grain. The remaining product is a concentrate of proteins and fibre that is suitable for animal feeding, particularly for ruminants. Brewer's grains are a highly variable by-product whose composition and nutritional value depend on the grain used, on the industrial process (temperature, fermentation, etc.) and on the method of preservation. Brewers grains are sold wet or dried, and can be ensiled.

Wet brewer's grains are a highly perishable and bulky product that is costly to transport. Their distribution is, therefore, limited to a radius of 150-350 km around the brewery. Dehydration, despite its high energy cost, facilitates the distribution of brewer's grains beyond their area of production, as dried brewers grains are less bulky and less expensive to transport

Coconut meal (Copra meal, copra cake, coconut meal, coconut cake, expeller copra meal, expeller copra cake)

Copra meal, or coconut meal, is an important feed ingredient and the by-product of the oil extraction from dried coconut kernels (copra).

Corn hominy meal (maize bran and maize hominy)

Maize bran is a by-product of various maize processing industries, including starch and ethanol production, and the production of maize-based foods. While maize bran theoretically consists of the bran coating removed in the early stages of processing, the maize bran sold for livestock feeding is usually a mixture of the bran fraction and other by-products and is, therefore, a very loosely defined product of highly variable composition. In the case of ethanol production, maize bran is defined as the mixture of the bran fraction and distillers solubles. In the starch extraction process, maize bran is usually mixed with steep liquor to produce corn gluten feed. In the production of maize grits by the dry milling process, maize bran is mixed with broken kernels, germ residue after oil extraction, and inseparable fractions of germ, pericarp and endosperm to produce hominy feed. Maize bran and hominy feed are closely related and form a continuum in terms of chemical composition. It must be noted that hominy feed is sometimes referred to as "hominy" although hominy is a distinct food product, and not a by-product.

Corn gluten feed (maize gluten feed)

Corn gluten feed is the by-product of the wet-milling of maize grain for starch (or ethanol) production. Corn gluten feed consists mainly of maize bran and maize steep liquor (liquid separated after steeping) but may also contain distiller's solubles, germ meal, cracked maize screenings, as well as minor quantities of end-products from other microbial fermentations. The chemical composition of corn gluten feed varies hugely, as it depends on the milling process and on the relative proportions of bran, steep liquor and other components. Particularly, the energy and protein content of corn gluten feed are positively correlated to the proportion of steep liquor in the blend.

Corn gluten feed is a feed ingredient mostly used in cattle diets as a source of energy and protein. Its economic value depends upon the relative price of whole grain and protein feeds.

Corn gluten meal (maize gluten meal, gluten 60, prairie meal)

Corn gluten meal is a by-product of the manufacture of maize starch (and sometimes ethanol) by the wet-milling process. Corn gluten meal is a protein-rich feed, containing about 65% crude protein (DM), used as a source of protein, energy and pigments for livestock species including fish. It is also valued in pet food for its high protein digestibility.

Note: it is important to note that corn gluten meal should not be mistaken for corn gluten feed, which contains about 22% crude protein rather than 65% and is nutritionally completely different.

Corn gluten meal can be fed wet or dried, but dried is more common.

Linseed meal (Linseed meal, linseed oil meal, linseed oil cake, linseed cake, flaxseed meal, flax meal)

Linseed meal is the by-product of oil production from linseeds (*Linum usitatissimum* L.). Linseeds are primarily used for the production of linseed oil, which is used in paints and in other industries, such as the manufacture of linoleum. Linseeds and linseed meal have attracted considerable attention since the 1990s due to the presence in the oil of polyunsaturated fatty acids (PUFA), notably alpha-linolenic acid (ALA, an omega-3 fatty acid) and conjugated linoleic acid (CLA). Supplying these fatty acids to the diets of livestock is being used to alter the fatty acid profile of meat, milk and eggs in order to provide health benefits to human consumers. Linseeds and linseed oil contain large amount of lignans, which act in mammalians as phytoestrogens and have anti-carcinogenic properties.

Lupin meal

Lupin Meal consists of lupin hulls and particles of lupin kernel. The product is mainly used for stock feed. It is highly digestible and has an average of 17% protein. While used as a feed ingredient for ruminants, pigs and poultry, lupin meal is increasingly being used in aquaculture.

Maize germ meal (corn germ meal)

Maize germ meal (corn germ meal) is the by-product of oil extraction from maize germs obtained from maize processing. It is a product of moderate to good nutritive value suitable for all classes of livestock but its composition is highly variable.

Maize germ meal is considered a good ingredient for all livestock species. Maize germ meal readily absorbs liquids such as molasses and tallow and is, therefore, a useful carrier for liquid nutrients. It is a very variable product: its protein, oil, fibre and starch contents depend on the processes used for producing the germs and for extracting the oil, together with the amount of other maize by-products mixed with the spent germs. The residual oil, for instance, may be lower than 5% DM or higher than 14% DM, which will affect the energy value of the product. Likewise, the amount of residual bran will affect the fibre content and thus the suitability of the germ meal for pigs and poultry. As a result, the nutritive value of a given batch may differ from values published in feed composition tables by a large margin; if possible, maize germ meal should be analysed on a case-by-case basis, or at least by origin (processing plant).

It is important to note that while there are official definitions for maize germ meal and maize germs, these products are actually part of a continuum of loosely named by-products yielded by the wet milling and dry milling maize industries (see Processes below). Products sold under these names may contain variable, or even substantial, amounts of bran, endosperm fragments and other residues. Maize germ meal from the wet milling industry can be very close to corn gluten feed, and from the dry milling industry very close to maize bran or hominy feed. Likewise, it is difficult to tell poorly extracted maize germs from low-oil maize germs from dry milling. The names themselves can also be a source of confusion: in French, "tourteau de germes de maïs" (maize germ meal) sounds like "tourteau de maïs" (hominy feed); in English, "maize germ meal" can easily be mistaken for "maize germs" and studies of "maize germ meal" (a product containing 1 to 20% oil) may actually concern full-fat maize germs (50% oil). Unlike most ingredients, maize germ meal is not a single product but a group of products of widely differing nutritional value.

Oat bran/Oat hulls

Oat bran is a by-product of oat flour production. It is used as a health food for human consumption due to its hypoglycemic and hypocholesterolemic effects and high content of B vitamins.

It is important to note that oat hulls and oat bran are completely different products: oat hulls are a high fibre, low protein and low energy feed while oat bran is a low fibre, high protein and high energy food ingredient. However, the name oat bran is sometimes used as a generic term for more or less fibrous oat by-products, which may be a source of confusion.

Oat hulls, oat mill feed and other oat by-products do not have universally accepted definitions and clear boundaries. Some national official regulations contain mandatory requirements on their composition, but ingredients sold under those names often encompass a wide range of by-products ranging from pure hulls to mixtures of hulls, screenings, and residual endosperm particles.

Palm kernel meal (Palm kernel meal, palm kernel cake, expeller palm kernel meal, solvent-extracted palm kernel meal)

Palm kernel meal is an important feed ingredient and the by-product of the oil palm (*Elaeis guineensis* Jacq.). This palm tree is cultivated for its oils rich in highly saturated vegetable fats: the palm oil, extracted from the fruit flesh; and the palm kernel oil, extracted from the fruit kernel. Palm kernel meal is the main by-product of the palm kernel oil extraction process. It is a highly fibrous and medium grade protein feed, hence most suited to ruminant or rabbit feeding. Palm kernel resulting from mechanical extraction contains 5-12% oil and solvent-extracted palm kernel meal contains 0.5-3% oil. Most of the palm kernel meal production goes to animal feeding. Palm kernel meal is an important feed commodity internationally traded with 90% of the production (5 million tonnes) being exported, 50% of it to the European Union.

Peanut meal

Peanut meal is the by-product obtained after the extraction of oil from peanut seeds (peanuts) (*Arachis hypogaea* L.). It is a protein-rich ingredient that is widely used to feed all classes of livestock. Peanut meal is the sixth most common oil meal ingredient produced in the world after soybean meal, rapeseed meal, sunflower meal, cottonseed meal and palm kernel meal. Peanut meal is generally considered as an excellent feed ingredient due to its high protein content, low fibre, high oil (for expeller meal) and relative absence of antinutritional factors. It is often the default high protein source in regions where soybean meal is too expensive or not available. Peanut meal is produced by mechanical extraction only (expeller) or by mechanical followed by solvent extraction. It is also sold in pellet form. Expeller meal consists of light gray to brownish pieces (flakes) of variable size with a smooth, slightly curved surface. Solvent-extracted meal consists of light gray to brownish flakes of varying sizes. Peanut meal pellets vary between 1.5 and 40 mm in diameter and are light to dark gray in colour.

Rapeseed meal (Rapeseed meal, rapeseed oil meal, canola meal, canola seed meal)

Rapeseed meal, called canola meal in North America, Australia and some other countries, is the by-product of the extraction of oil from rapeseed (*Brassica napus* L., *Brassica rapa* L. and *Brassica juncea* L., and their crosses). It is a protein-rich ingredient that is widely used to feed all classes of livestock. Worldwide production of rapeseed meal is second only to soybean meal. The use of rapeseed meal as an animal feed was limited by the presence of glucosinolates, which are antinutritional factors detrimental to animal performance. In the 1960-1970s, low-erucic varieties ("0") and low-erucic, low-glucosinolate varieties ("00", double-zero, double low, canola) were developed, allowing rapeseed oil to become a major food oil, and rapeseed meal and rapeseeds to grow in importance as fed to livestock. The first 00 varieties were introduced commercially in Canada in the mid-1970s. In some countries, such as France, 00 varieties became commercially available in the late 1980s. Low-erucic, low-glucosinolate varieties are now the main types grown worldwide for edible oil, biofuel, industrial oil and lubricants. There are also high-erucic varieties grown for specific industrial purposes. While solvent-extracted rapeseed meal remains the main type of rapeseed meal commercially available, oil-rich rapeseed meals obtained by mechanical pressure have gained popularity since the turn of the century with the development of organic farming and on-farm oil production.

Note: the name "canola" was originally a trademark licensed by the Canadian Canola Council and referred to low erucic/low glucosinolate varieties developed in Canada. It is now used as a generic term for 00 varieties in North America, Australia and other countries.

Safflower meal

Safflower seeds used for oil production may be either cold pressed, expeller pressed or solvent extracted. The by-product, safflower meal, is mostly used as a protein ingredient for animal feeding. Dehulling improves crushing efficiency, but the hardness of the seed coat and the extreme softness of the kernel make the operation costly and only economically viable if there is a market for hulls. High-protein meals containing more than 40% protein can be obtained by sifting the regular meal and removing hull fragments. The quality of safflower meal is highly variable as it depends on the amount of hulls and on the extent of oil extraction.

Sesame oil meal

Sesame oil meal (or sesame oil cake) is the protein-rich by-product obtained after oil extraction. Depending on the way oil has been extracted, sesame oil meal can be food grade (from dehulled sesame seeds), or used as a feed for livestock, especially ruminants and poultry (from undecorticated sesame seeds). It is a valuable source of protein for animals. Unlike other oil meals, sesame oil meal is usually obtained by mechanical extraction only (rather by mechanical extraction followed by solvent extraction) and its residual oil content is high.

Sugarcane bagasse

Bagasse is the residual fibre resulting from the extraction of sugarcane juice. There are two main types of bagasse.

- **Factory bagasse** comes from industrial processes involving repeated extraction steps. The bagasse is the fibrous by-product of sugarcane stalks milled for juice extraction. The fibre is passed through sieves to remove fine particles which may be used as a filter aid later in the process, or as a feedstuff (“pith bagasse”).
- Pressed cane stalks, or "farm bagasse" is obtained from on-farm or small factory cane fractionation that uses only 2 or 3 crushers. Due to the reduced efficiency of the extraction process (50% vs. 70% extraction rate), it contains higher amounts of sugar-rich juice and is more valuable for ruminants.

Tomato pomace

Tomato processing yields the following by-products, which represent 5-13% of the whole tomato:

Pomace is the mixture of tomato peels, crushed seeds and small amounts of pulp that remains after the processing of the tomato for juice, paste and ketchup. Tomato paste being the primary tomato product produced worldwide, tomato pomace is the main tomato by-product available for animal feed.

Fresh tomato by-products have the same drawbacks as other high-moisture feed ingredients: they are costly to transport, they spoil quickly, their nutritive value per kg fresh matter is low and their bulkiness limits intake. For these reasons, tomato pomace, skins and seeds are usually ensiled or dried before being fed to ruminants, poultry and other livestock. However, they may be particularly useful during dry periods when other feeds are in short supply.

Definitions for maize meals taken from AAFCO

Corn feed meal is the fine siftings obtained from screened cracked corn with or without its aspiration products added.

Synonyms: maize grain fines

Corn gluten feed is that part of the commercial shelled corn that remains after the extraction of the larger portion of starch, gluten and germ by the processes employed in the wet milling manufacture of corn starch or corn syrup. It may or may not contain one or more of the following: fermented corn extractives, corn germ meal

Synonyms: maize gluten with bran

Corn gluten meal is the dried residue from corn after the removal of the larger part of the starch and germ, and the separation of the bran by the process employed in the wet milling manufacture of corn starch or corn syrup or by enzymatic treatment of the endosperm. It may contain fermented corn extractives and/or corn germ meal.

Synonyms: maize gluten meal

Hemicellulose Extract is a by-product of the manufacture of pressed wood. It is the concentrated soluble material obtained from treatment of wood at elevated temperature and pressure without the use of acids, alkalis, or salts. It contains pentose and hexose sugars, and has a total carbohydrate of not less than 55%.

Hominy Feed is a mixture of corn bran, corn germ, and part of the starchy portion of either white or yellow corn kernels or a mixture thereof, as produced in the manufacture of pearl hominy, hominy grits, or table meal, and must contain not less than 4% crude fat. If prefixed with the words “white” or “yellow”, the product must correspond thereto.

Synonyms: maize grits by-product, maize dent yellow grits by-product, maize dent white grits by-product

Corn germ meal (dry milled) is ground corn germ which consists of corn germ with other parts of the corn kernel from which part of the oil has been removed and is the product obtained in the dry milling process of manufacture of corn meal, corn grits, hominy feed, and other corn products

Synonyms: maize germ meal dry milled mechanical extracted

Corn germ meal (wet milled) is ground corn germ from which most of the solubles have been removed by steeping and most of the oil removed by hydraulic, expeller, or solvent extraction processes, and is obtained in the wet milling process of manufacture of corn starch, corn syrup, or other corn products.

Synonyms: maize germ without extractives meal wet milled mechanical extracted

Canada

BACKGROUND

CCPR50 (2018) agreed to:

(i) align the structure of Class C based on the water content of feeds (high water content versus low water content) so as to facilitate crop grouping and extrapolation of maximum residue limits (MRLs) and

(ii) group all feed commodities under Class C and consequently transfer processed feed commodities from Class D (Processed Food Commodities of Plant Origin) to Class C (Primary Animal Feed Commodities).

CCPR (2018) also agreed that the EWG for the Revisions to the Codex Classification of Food and Feed would:

(i) continue the work on the revision of Class C based on the structure agreed by CCPR50;
(ii) consider the addition of new commodities to Class C; and
(iii) considered the addition of subgroups to the groups of feed that would include processed commodities in order to group all feed commodities under Class C which may involve the relocation of commodities from Class D to Class C in accordance with the Terms of Reference (TOR) given to it by CCPR50.

CURRENT STATUS

The proposed revised Class C is summarized in Appendix 1 of CX/PR 19/51/6. The revised Type 11 includes an additional subgroup for processed products and additional commodities have been added to groups 50, 51, and 52.

Canada has proposed separating out grasses from cereal grains due to the difficulty in identifying appropriate representative commodities. Grasses could be separated into warm season and cool season grasses.

Members of CCPR are invited to consider the revised Class C (Appendix I) taking into account the conclusions and recommendations in relation to the revision of Class D and the proposals for the transfer of processed commodities from Class D to Class C in the relevant working documents under Agenda item 7 (b) and 7(c).

Members are also invited to consider the comments on the separation of grasses from cereals grains and how this proposal could be accommodated in the revised Class C.

Canada's Position on the revised Class C and the proposal to separate grasses from cereals grains and how this proposal could be accommodated in the revised Class C.

- 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 C, 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. In addition, during the work of the EWG, Canada had proposed that grasses be separated from cereal grains.
- Canada is in agreement with the additional commodities included in Subgroups 050A Products of legume feeds with high water content (forage), 050B Products of legume feeds with low water content (hay) and 050C Processed products of legume feeds (such as silage, meal, hulls).
- Canada is in agreement with the additional commodities included in Subgroups 051A (Cereal grains and grasses (including pesuedocereals) feed products with high water content (forage), 051B(Cereal grains and grasses (including pesuedocereals) feed products with low water content (hay) and 051C (Cereal grains and grasses (including pesuedocereals) feed products processed products(such as silage, bran, hulls).
- Group 051 includes both cereal grains and grasses. This may be problematic when identifying appropriate representative crops for these subgroups and would require both cereal data and grass data to obtain a subgroup MRL. Canada recommended that cereals and grasses be separated and that an additional subgroup (051D) be created for grasses. No subgroup would be required for processed products as there are no processed products for grasses This proposal has been carried forward for comment by CCPR members. Canada is in agreement with this proposal.
- Canada is in agreement with the revisions to Group 052 (Miscellaneous Feed Products).

Editorial Corrections to Appendix I

- The name of the subgroup under code No. AS3304 is incorrect. It should be "hay,straw" and not "forage"
- Subgroup 051C and Code No. AS 3305 do not specify "processed products" in the name.

China

China suggests checking the commodity number of AV 3307, AV 3308, AV3309, all of these commodities are the subgroup, however, the code number should be in the range of 0001-0200, or 2001-2199 which are used for subgroup.

in Page18 of CX/PR 19/51/6., there are two AM 0269 (grape pomace, dry; soya bean hulls). They should be corrected. The commodity of soya bean hulls should be AL 3387.

Egypt

Egypt agrees on the classification mentioned in the following documents:

Document no. CL 2019/01-PR related to: Revision of the Classification of Food and Feed (CXM 4-1989) Class C: Primary Animal Feed Commodities Request for comments at Step 3.

Ghana

Ghana appreciates the opportunity to submit comments at the forthcoming 51st Session of the Codex Committee on Pesticide Residues (CCPR51)

Position:

Ghana commends the work of the Electronic working group chaired by the United States of America and co-chaired by the Netherlands.

We support the proposed classification of the Class C, Type II into the 3 Groups 50 (Legume feed products), Group 51 (Cereal grains and grasses (including pseudo-cereals) feed products; and Group 52 Miscellaneous feed products) as agreed by CCPR50.

Group 050 Legume feed products

Concerning Group 50 (Legume feeds, primary feed commodities of plant origin), we support the proposed Subgroups; Subgroup 050A: Products of legume feeds with high water content (forage), AL Subgroup 050B: Products of legume feeds with low water content (hay), AL Subgroup 050C: Processed products of legume feeds (such as silage, meal, hulls).

Group 051 Cereal grains and grasses (including pseudo-cereals) feed products:

Ghana supports the proposed subgroups:

i) Subgroup 051A: Cereal grains and grasses (including pseudocereals) feed AF products with high water content (forage),

ii) Subgroup 051B: Cereal grains and grasses (including pseudocereals) feed AS products with low water content (hay, straw),

iii) Subgroup 051C: Cereal grains and grasses (including pseudocereals) feed AS products processed products (such as silage, bran, hulls), and

iv) The creation of Subgroup 051D: Grasses

We support the separation of the Cereal Grasses to a separate Subgroup 51D as proposed, a separate subgroup in the Cereal grains and grasses (including pseudo-cereals) feed products.

a) We propose the inclusion of common names used in some regions including:
   i) Inclusion of Elephant grass, Uganda grass with reference to Napier grass (*Pennisetumpolystachion* (L.) Schult
   ii) Inclusion of spear grass with reference to Tangle head (*Heteropogoncontortus* (L.) P. Beauv. Ex. Roem. & Schult.
   iii) Inclusion of Savannah grass
   iv) Inclusion of typhoon grass (Poaceae family)

b) In the Subgroup 050A, Products of legume feeds with high water content (forage); we propose the inclusion of the following:
   i) Inclusion of Egyptian clover (*Trifolium alexandrinum*)
   ii) Inclusion of Butter nut forage (*Cucurbita moschata*)
   iii) Inclusion of horse bean forage (*Vicia faba*)Inclusion of Cyamopsis (Family Fabaceae)

Ghana also supports the classification of potential grass commodities into “cool season and warm season”.

Rationale:

The proposed Groups are consistent with the agreed principles of crop grouping; this will provide possibility of elaborating maximum residue limits for the commodities in the Group. Further the inclusion of a separate subgroup for Grasses (Subgroup 051D), which are different morphologically, hence are commodities with similar potential for pesticide residues.

Potential grass commodities for the determination of Maximum Residue Limits (MRLs) have been divided into cool season and warm season grasses because they are biological different and therefore their MRLs values may also be different. The separation of the Grasses Subgroup (051D) may also facilitate the rapid identification of these commodities when setting MRLS.