

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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Agenda Item 8(c)

CX/PR 16/48/8-Add.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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**COMMENTS at Step 3 on the proposed draft revision of the CLASSIFICATION OF FOOD AND FEED:
Selected vegetable commodity groups: Group 011: Fruiting vegetables, cucurbits
submitted by Australia, Canada, Chile, El Salvador, European Union, Japan, Kenya,
United States of America and African Union**

Australia

Australia supports Option 3 as presented in CX/PR 16/48/8, with two subgroups.

- Subgroup 011A Fruiting vegetables, Cucurbits such as cucumbers, and summer squashes (zucchini);
- Subgroup 011B Fruiting vegetables, Cucurbits such as melons, pumpkins and winter squashes.

Australia also wishes to include the following commodities under Code VC 0429 Pumpkins

- Cocozzelle (*Cucurbita pepo* var. *ionga*)
- Crookneck pumpkin (*Cucurbita pepo* var. *torticolli*)
- Scallop pumpkin (*Cucurbita pepo* var. *clypeata*)
- Straightneck pumpkin (*Cucurbita pepo* var. *recticollis*)

Canada

Background:

Discussions which took place during the 47th Session of CCPR (May 2015) concluded that no agreement could be reached on the grouping of Group 011 Fruiting vegetables, cucurbits and that the issue should be put back to the Electronic Working Group on the revision of the Classification (EWG) to Step 2/3 for further consideration in order to come up with one or two options for this crop group.

Current Status:

Five subgroup options were considered by the EWG:

Option 1: 11A Cucumber and Summer Squash, 11B Melons, 11C Winter Squash;

Option 2: 11A Melon, 11B Squash/Cucumber (includes winter squashes and pumpkins)

Option 3: 11A Cucumber and Summer Squash, 11B Melons and Pumpkins (includes winter squashes and pumpkins)

Option 4: 11A Cucumber and Melons, 11B Squashes

Option 5: No subgroups

Taking into consideration comments received from participants in the EWG with respect to rationales for separating melon and winter squash; criteria used to separate or combine melon and winter squash; commodity specific residue data; and flexibility in the selection of representative commodities to avoid generation of additional residue data, the following compromise solution (Option 3) is presented:

SUBGROUPS
011A. Fruiting Vegetables, Cucurbits such as Cucumbers and Summer Squashes
011B. Fruiting Vegetables, Cucurbits such as Melons, Pumpkins and Winter Squashes.

Codex members and observers have been requested to provide comments on the revised Group 011 as presented in Appendix I of CX/PR 16/48/8. Comments submitted should take into account the mandate of the EWG following the discussion of this group at CCPR47 as well as the guiding principles and the criteria for crop group of the Classification of Food and Feed.

Canada's Position on the Revised 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. It is noted that the revisions to this crop group only list the proposed subgroups with no discussion on the potential representative commodities for each subgroup. Canada supports the proposed compromise for the revised Fruiting Vegetables, Cucurbits Group (GROUP 011) as presented in Appendix I of CX/PR 16/48/8., provided that this does not result in the need for an additional representative commodity for this group (i.e. only one representative commodity, muskmelon, is required for Subgroup 11B).

Chile

I. General Comments.

Chile appreciates the work done by the electronic Working Group, led by the United States of America and co-chaired by The Netherlands.

Additionally, in consideration of the recommendations proposed by the EWG Chile supports the compromise solution reached by the eWG members corresponding to Option 3: 11A *Cucumber and Summer Squash*, 11B *Melons and Pumpkins (includes winter squashes and pumpkins)*; in order to complete this work at the 48th session of the CCPR. Similarly we support the revised version of Group 011 based on Option 3, which includes comments made by Chile at the CCPR47 and in the EWG.

El Salvador

Option 3 is supported:

Subgroup 011A Fruiting vegetables, Cucurbits such as cucumbers and summer squashes (edible peel)

Subgroup 011B. Fruiting vegetables, Cucurbits such as melons, pumpkins and winter squashes (inedible peel)

European Union

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 011 – Fruiting vegetables, cucurbits.

The EU supports the proposed Compromise Option 3 as set out in document CX/PR 16/48/8. While the system in the EU is based on the classification of cucurbits according to the “edibility” or “inedibility” of their peel, the EU acknowledges that different eating habits exist around the world and considers it important to find a compromise solution.

The EU has contributed to the Electronic Working Group with extensive data showing that Compromise Option 3 is consistent with the seven criteria for crop grouping, mentioned in Appendix IV of **CX/PR 16/48/8**.

The EU therefore supports advancing the document to the next step.

Japan

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the draft revision of the Codex Classification for Group 011 Fruiting Vegetables, Cucurbits (CX/PR 16/48/8). Japan would like to provide the following comments on the proposed subgrouping of this commodity group.

In order for exposure assessment to better reflect the real intake situations, **Japan supports Option 1 to separate melons and winter squashes into different subgroups** based on the differences in their edible portion and processing method before eating. **If a compromise is required, Japan could support Option 3 to include melons and winter squashes into the same subgroup provided that the following text is added after the last sentence of the 3rd paragraph in the section on description of this commodity group.**

“A number of varieties of winter squashes are eaten with peels, which needs to be considered in exposure assessment of these commodities to avoid underestimating the dietary intake of pesticide residues.”

The reasons and relevant information on the above position are as follows:

Melons and winter squashes are similar in that fruits are harvested after they reached full size and maturity, which may lead to similar residue potentials at the same or similar GAPs. However, it should be noted that their edible portions are different and they require different processing before consumption. While melons such as cantaloupe, honeydew melons and muskmelons are generally eaten raw as fruits after peeling, winter squashes are eaten after cooking and a number of their varieties can be eaten peel. For example, winter squashes with peels attached are cut and simmered in seasoned broth and commonly-consumed throughout Japan (see Fig. 1).

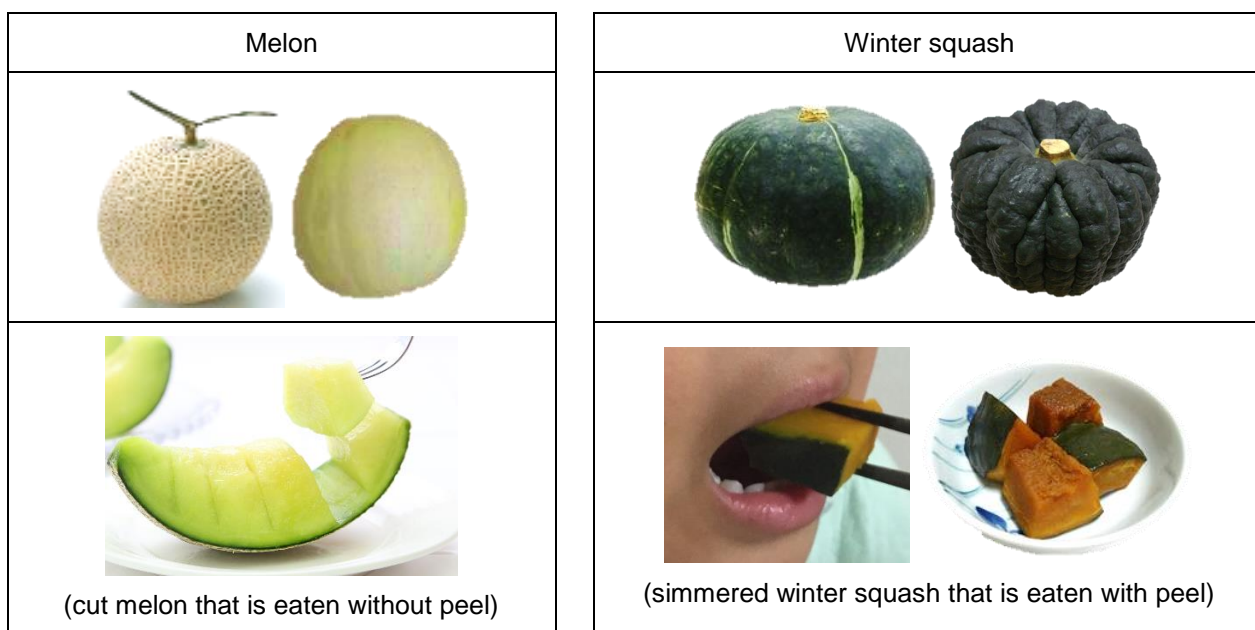


Fig. 1 Examples of Melons and Winter squashes

For the purpose of protecting consumers’ health, exposure assessment of food commodities (except for those of which peels are never eaten) should consider the worst-case situations where consumers eat the whole fruits likely to contain higher concentrations of pesticide residues than those in pulp after peeling. For this reason, while exposure assessment for melons are generally conducted on the basis of residue data in pulp when such data are available, exposure assessment for winter squashes and other commodities of which peels are eaten need to be conducted on the basis of residue data on the whole commodity after removal of stems rather than the pulp.

Kenya

Issue: Subgrouping and new commodities for group 011: fruiting vegetables, cucurbits; subgroup 011A; VC 2039 - cucumbers and summer squashes and subgroup 011B VC 2040 - melons, pumpkins and winter squashes.

Position: we support the proposed subgrouping as presented in option 3 and appendix 1.

Rationale: The new subgroups commodities have similar morphology and similar potential for pesticide residues.

United States of America

The CCPR has been discussing the proposed changes to Group 011- Fruiting vegetables, cucurbits since 2014. To date, no agreement has been reached on this group. The issue was discussed again during 2015-2016 by the Electronic Working Group (EWG) on the revision of the Classification in order to come up with one or two options for crop grouping for Group 011 for consideration by the 2016 CCPR. The United States participated in the EWG during 2015-2016 and provided comments indicating that the United States would prefer the Group 011 - Fruiting vegetable, cucurbits be divided into an 11A. Melon subgroup and 11B. Squash/Cucumber subgroup. Through its participation in the EWG, the United States recognized there appears to be little support for the U.S. preferred option. So the United States had indicated to the chair of the EWG, as a compromise, it could support the option with two subgroups including 11A. Cucumber and Summer Squashes and 11B. Melons and Pumpkins, provided there was no need for additional data on another representative crop (i.e. more than one crop for the melon subgroup).

Agreeing to this compromise does not come without its challenges for the United States. If the proposed compromised subgroups 11A. Cucumber and Summer Squashes and 11B. Melons and Pumpkins were adopted by the United States when it revises its crop grouping scheme for cucurbits, implementing this change will impact all existing Cucurbit Group/Subgroup Tolerances (MRLs) as well as all the currently approved registered labels for this Group/Subgroup. However, after reading Agenda Item 8(g) "*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*", as it is currently written, the United States cannot agree with the proposed compromise. Our primary concern is the requirement of melon and/or watermelon **and** pumpkin or winter squash data to support the Group 011- Fruiting vegetables, cucurbits and Subgroup 011B. Fruiting vegetables, Cucurbits such as Melons, Pumpkins and Winter Squashes.

The United States disagrees with the requirement of residue field trial data on winter squash or pumpkin, in addition to melon data. The United States can agree to the compromise option if the residue field trial generated for melon can be used to represent winter squash and pumpkin or if the representative commodities are listed as melon or pumpkin or winter squash. Based on the principles of crop grouping, the United States believes melon would be the best crop to represent the subgroup since it typically has the shorter pre-harvest interval (PHI), the netting on the rind will result in higher residues and the consumption of melon is higher than pumpkin or winter squash. Yet, to agree to a compromise which includes the requirement of the additional data for winter squash or pumpkin, will be an undue burden on minor use growers in the United States. Please refer to the discussion under agenda item 8(g) for further information regarding the U.S. position.

African Union

Background:

It is recalled that the revision of the Codex Classification of Foods and Animal Feeds (CAC/MISC) had been approved by the 27th Session of the Codex Alimentarius Commission, and the CCPR at its 39th Session agreed to establish an electronic working group to further advance the revision.

It was further agreed that it should keep in mind that the revision should be fit for the purpose of the classification which was to facilitate the establishment and interpretation of MRLs.

During the 47th Session of the CCPR, no agreement was reached and the issue should be put back to the EWG for further consideration to come up with one or two options crop grouping for Group 011 for consideration at the 48th Session of the CCPR.

Position: AU welcomes the outcome of the EWG on classification. We support option 3, 11A cucumber and summer squash, 11B melons and pumpkins (includes winter squash and pumpkins)

Issue & Rationale: Cucumber, winter squash also known as pumpkins in Africa and melons are widely grown and consumed in many parts of Africa. Similarities in the morphologies among the members of each subgroup may result in similar residue pattern.