

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7, 8a, 8b, 8d, 8e, 8g

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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Comments of Japan on Agenda Items 7, 8a, 8b, 8d, 8e, 8g

Japan would like to thank the electronic working group led by the United States of America and the Netherlands for preparing the draft revised Codex Classification for a number of commodity groups (Agenda item 8(a) – 8(g)). Japan would also like to thank Thailand for preparing the discussion paper on the impact of the relocation of *Vigna* spp. under beans on the CXLs for peas (Agenda item 7). We provide the following comments on these issues:

Agenda items 7, 8 (a) and 8(b) : GROUP 014 LEGUME VEGETABLES and GROUP 015 PULSES

Relocation of *Vigna* spp. under Beans

1. The objective of Codex Classification of Foods and Feeds is “to classify foods into groups and/or sub-groups for the purpose of establishing group maximum residue limits for commodities with similar characteristics and residue potential.” Among the most important criteria for crop/commodity grouping are number 1 (Commodity’s similar potential for pesticide residues) and 5 (Similar GAP for pesticide uses) because they are the key determinants of group MRLs. These criteria should also be considered when transferring a commodity from one (sub)group to another (sub)group.
2. For this reason, with regard to mature/immature beans of *Phaseolus* spp. and those of *Vigna* spp., Japan considers it necessary to compare their GAPs and pesticide residue concentrations after pesticide use following the same or similar GAP, in addition to the information on morphology, growth habit, major pests and diseases as described in the discussion paper prepared by Thailand (CX/PR 16/48/6). It will be useful to conduct analysis for these commodities, similar to the one we provided for wheat and barley shown in CX/PR 16/48/8-Add.1.
3. It should be noted that analysis for at least for some compounds indicates that CXLs for mature/immature beans of *Phaseolus* spp. may not be high enough for *Vigna* spp. For example, CXLs of Methoxyfenozide are established at 0.5 mg/kg for VD 0071 Beans (dry) (*Phaseolus* spp.) and at 5 mg/kg for VD 0072 Peas (dry) (*Pisum* spp. *Vigna* spp.). The 2009 JMPR evaluated residue data on dry beans (*Phaseolus* spp.) and cowpeas (black eyed peas) (*Vigna unguiculata* (L.) Walp) from supervised trials conducted according to the same US GAP (4 x 0.28 kg ai/ha at 7-14 days, with a PHI of 7 days). The residues in *Phaseolus* dry beans were: <0.05(9), and 0.22 mg/kg. The residues in cowpea, dry were: 0.13, 0.17, 0.56, 0.67, 3.4 mg/kg. The CXL for Beans, dry of 0.5 mg/kg is too low to cover residues in Cowpea, dry and not appropriate.
4. Both beans (dry) (*Phaseolus* spp.) and peas (dry) (*Pisum* spp. *Vigna* spp.) are major commodities in production and consumption¹ and there are already a number of CXLs established for the both commodities. The Committee is required to consider carefully how to apply existing CXLs for the commodities of *Vigna* spp. as well as whether to merge the commodity code for *Vigna* spp. and *Phaseolus* spp because these changes will have significant impacts on the international trade of these products.

¹ These commodities are listed in Table 1 of the *Information Document on the Application of the Guidance to Facilitate the Establishment of MRLs for Pesticides for Minor Crops*

Classification of other commodities which include “pea” in their names

5. While the name of VD 0072 Peas (dry) implies the inclusion of various pulses with the term “pea” in their English names, it is proposed that this commodity includes only *Pisum* spp. It is necessary to clarify how to deal with those pulses other than *Pisum* spp. with the term “pea” in their English name, such as Chick peas or Pigeon pea in Subgroup 15B.

The name of Subgroup 15C

6. Since the Codex Classification of Foods and Animal Feeds is intended to be used globally, subgroups and commodities should be named in a way that even non-native English speakers can readily understand. The use of the term “legumes” for the name of subgroups of Group 015 Pulses may cause confusion because the term “legume” is used to mean fresh beans and peas under Group 014 Legume vegetables. In order to clarify that the commodities included in the Subgroup 15C are dry, the name of the subgroup should be amended to read as follows:

Group 015 Pulses

- Subgroup 15A Dry beans
- Subgroup 15B Dry peas
- Subgroup 15C Dry underground ~~legumes~~ pulses

Agenda Items 8 (d) and 8 (e) : GROUP 020 CEREAL GRAINS and GROUP 021 GRASSES FOR SUGAR AND SYRUP PRODUCTION

Portion of the commodity to which the MRL applies (and which is analyzed)

7. Japan would like to seek clarification from the Chair of the electronic working group the reason why Group 021 (Grasses for Sugar and Syrup Production), as opposed to all the other commodity groups, does not include a reference to the *Portion of the commodity to which the MRL applies (and which is analyzed)*. It will be useful to include the reference for this commodity group in order to improve the consistency, ease of use and transparency of the Codex Classification.

Common names of the commodities in relation to “Sorghum”

8. While GC 0651 Sorghum is included in Group 020 Cereal grains, GS 0658 Sorgho or Sorghum, Sweet is included in Group 021 Grasses for sugar or syrup production. In order to clarify *Portion of the commodity to which the MRL applies (and which is analyzed)* for these two commodities, Japan proposes to amend their common names as follows:

GC0651 Sorghum, grain

Sorghum bicolor (L.) Moench; several *Sorghum* spp. And cultivars

GS0658 Sorgho or Sorghum, Sweet (stem)

varieties and cultivars of Sorghum of which the stems contain considerable amounts of sweet juice. Among others cultivars of

Sorghum bicolor (L.) Moench.

S. dochna (Forsk.) Snowden

Agenda Items 8 (d) and 8 (f) : GROUP 020 CEREAL GRAINS and GROUP 024 SEEDS FOR BEVERAGES AND SWEETS

Chia seed and Basil seed

9. While GC 3081 Chia (*Salvia hispanica* L.) is proposed to be included in Group 020 Cereal grains, SB 3180 Basil, seeds (*Ocimum basilicum* L.) is proposed to be included in Group 024 Seeds for beverages and sweets. Both of the commodities should be included in the same Subgroup 20A of Group 020 Cereal grains for the following reasons:
- Both basil and chia belong to *Lamiaceae* family and their seeds are eaten after soaking in water. When soaked in water, they form a gelatinous membrane around the seed and their texture becomes somewhat slimy; and

- Soaked basil seeds are eaten directly or after adding them to some beverages and sweets as well as other foods such as cereals, soups and salads to give slimy texture to foods, though they are rather tasteless. On the other hand, other commodities in Group 024 such as coffee beans and cacao beans are used as raw materials for producing beverages and sweets after extensive processing such as fermentation, drying, milling, roasting and grinding.
10. It should also be noted that HS 0722 Basil seed (*Ocimum* spp.) is already included in the subgroup 028A Spices, seeds of Group 028 Spices of which the revised classification is now retained at Step 7. The Committee needs to ensure that this commodity is included in only one group, with only reference in the other group, before finalizing the revision of classification of commodity groups under Type 02 Vegetables, Type 03 Grasses and Type 5 Herbs and Spices.