

CODEX ALIMENTARIUS COMMISSION



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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Agenda Item 7b

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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COMMENTS on the Draft Revision of the Codex Classification of Foods and Animal Feeds at Step 7:

Fruit Commodity Groups: Edible Flowers and Tropical and Sub-tropical Fruits - Edible and Inedible Peel submitted by Brazil, Canada, Costa Rica, European Union, Iran, Japan, Kenya and Senegal

BRAZIL

Brazil has no objection to the proposed revisions to the Codex Classification for Fruit Commodity Groups.

CANADA

Canada is in agreement to keep Jujube in the Assorted tropical and sub-tropical fruits – edible peel group instead of transferring it to the Stone Fruits group. This is consistent with the International Crop Grouping Consulting Committee's (ICGCC) decision/recommendation when the Stone Fruits group was revised (ChemSAC date of July 29, 2009).

Canada is in agreement to transfer Kumquats and Limequats to the Citrus fruit group in the Lemons and Limes subgroup. The inclusion of Kumquats in the Citrus fruits group is consistent with the ICGCC's revisions to the group in October 2007.

The proposed revisions to tropical and sub-tropical fruits (edible and inedible peel) by the International Crop Grouping Consulting Committee (ICGCC) was submitted to the PMRA and EPA for analysis on November 2010. The revisions have not yet been presented at ChemSAC for discussion and approval. However, Canada has no objections to the following proposals:

- o Keep "Persimmon, Japanese" in the Assorted Tropical and Sub-Tropical Fruits – edible peel – medium to large group
- o Transfer Tamarind to the subgroup Assorted Tropical and Sub-tropical Fruits – Inedible peel – small
- o To keep Madras thorn in its current position

The proposed revisions to the Herbs and Spices by the International Crop Grouping Consulting Committee (ICGCC) were submitted to the PMRA and EPA for analysis (June 2009). The revisions have not yet been presented at ChemSAC for discussion and approval. However, Canada has no objections to the proposal to keep the entry Edible flowers as a commodity in the group Herbs (herbaceous plants).

Canada is in agreement with the selected representative commodities for Group 001 Citrus Fruits, Group 002 Pome Fruits, Group 003 Stone Fruits, and Group 004 Berries and other small fruits as listed in TABLE 1 of document REP11/PR-Rev. The selected representative commodities in Table 1 share close similarity or are identical to the representative commodities selected for these crop groups as part of the ICGCC's revisions.

As indicated above, the proposed revisions to tropical and sub-tropical fruits groups by the ICGCC was submitted to the PMRA and EPA for analysis but have not yet been presented at ChemSAC for discussion and approval. As such, Canada does not have any specific comments in regards to the selected representative commodities for Group 005 (Assorted tropical and sub-tropical fruits – edible peel) and Group 006 (Assorted tropical and sub-tropical fruits – inedible peel) at this time.

COSTA RICA

Costa Rica is very grateful for this opportunity of expressing its commentaries and wants to express that they have already analyzed the document and they've shown their support.

EUROPEAN UNION

This classification seems to be based solely on taxonomy and it is generally recognised that shape, size and surface type of fruits are other important factors to be considered for the classification of plants species used in magnitude of residue studies. The EU does not support the proposal to classify kumquats and similar in the citrus group because residues are likely to be higher for kumquats due to the small size compared to other citrus fruit when using the same GAPs thus leading to possible non compliances.

Pulp peel refinements used in risk assessments, normally used for the citrus group cannot be applied to kumquats which are eaten with the peel, leading to possible unacceptable intakes.

The EU would prefer kumquats to be classified in assorted tropical and subtropical fruits edible peel small FT0026.

Assorted tropical and subtropical fruits – edible peel

Portion of the commodity to which the MRL applies (and which is analysed): Change Dates and Olives in: "Dates, olives and similar fruit with hard seeds".

FT 0299 Hog plum (=Mombin, yellow). Insert Mombin, yellow as separate entry with reference to Hog plum, FT 0299.

FT 0340 Java apple (= Wax jambu). Insert Wax jambu as separate entry with reference to Java apple, FT 0340.

Add the reference: Olives, table, see Table olives FT 0305.

Assorted tropical and subtropical fruits – inedible peel

Portion of the commodity to which the MRL applies (and which is analysed): Add after stone but: "*residue calculated and expressed on whole fruit*".

IRAN

Iran agree to classify Jujube in assorted tropical and subtropical fruits - edible peel commodities, as it is grown in subtropical environment and also its percentage of water and sugar is similar to these commodities.

Iran comments although kamquats and limequats are botanically in citrus fruit groupe but as they are eaten with peel and for other citrus fruit the pesticide residues ismor accumulated in peel when they are eaten unpeel, so the kamquate and limequte can not be classified in citrus fruit group. they sould classify as a individual groups for determinating CXs.

For Persimone, as it is related to Ebenaceae family, but as it is more similar to pome fruit group because of it,s water content and percentage of suger content so Iran coments this comodity classify to pomefruit group.

Geranium and Calendula leaves and flowers always us in fresh form but Herbs are used in herbal infusion form, which ismade by dried forms of herbs, so it is better to classify these flowers as a new individual group.

JAPAN

Japan appreciates the efforts of the United States of America and The Netherlands in leading the electronic working group for preparing the Draft Revision of the Codex Classification of Foods and Feeds for Edible flowers and Tropical and Sub-tropical Fruits - Edible and Inedible peel (CX/PR 12/44/9). We would like to provide our comments as follows:

FC 0303 Kumquats and FC 2214 Limequats

1. Japan supports the proposal to transfer "Kumquats" and "Limequats" to the Citrus fruit group in the subgroup of Lemons and Limes from Assorted tropical and sub-tropical fruits - edible peel – small.

FT 0307 Persimmon, Japanese

2. Japan again proposes to transfer "Persimmon, Japanese" to the Pome fruit group from Assorted tropical and sub-tropical fruits - edible peel – medium to large. Japan also proposes to change its main common name "Persimmon, Japanese" to "Kaki" which is consistent with scientific name as previously described in CX/PR 11/43/06-Add. 1. This change would facilitate distinction of "Persimmon, Japanese" from other persimmons to be retained in Assorted tropical and sub-tropical fruits group such as "Persimmon, Black" and "Persimmon, American."

(Characteristics and residue potential)

3. The shapes, sizes, and surfaces of "Persimmon, Japanese" in Eastern Asian countries where this commodity is mainly produced in the world, are similar to those of apples and pears and this fact indicates that potential pesticide residue levels in these commodities are similar. Thus inclusion of "Persimmon, Japanese" in the pome fruit group will raise no consumer health concerns.
4. Japan understands the basis of classifying commodities depending on taxonomy, however, priority should be given to classifying commodities based on similar characteristics and residue potential because the objective of Codex Classification of Foods and Feeds includes classifying foods into groups and/or sub-groups for the purpose of establishing group maximum residue limits for commodities with similar characteristics and residue potential.
5. It should be noted that there are some commodities with different families included in the same commodity group. For instance, the 42nd session of the CCPR agreed to include both "peppers" (*Solanaceae* family) and "okra" (*Malvaceae* family) in the subgroup of pepper and pepper-like commodities of Fruiting vegetables, other than Cucurbits at Step 7.

(No. of MRLs available)

6. At the 43rd session of the CCPR, as a result of the discussion on the proposal for moving some commodities such as persimmon from tropical fruit group to other commodity group, the committee agreed that further consideration should be given to the consequences of such a change as regards the establishment of MRLs and persimmon was retained in square brackets for further consideration. (see para. 97, REP11/PR)
7. In response to the above agreement of the last session of the CCPR, Japan examined the number of Codex MRLs for some commodity groups and analyzed the effects of moving a commodity from one group to another on the number of Codex MRLs available. The details are shown in the Annex to this comment.
8. The Annex shows that there is no group MRLs for Assorted Tropical and Sub-tropical Fruits – edible peel and that if the Committee retain “Persimmon, Japanese” in the group for tropical fruits, the Committee will lose an occasion for establishing group MRLs applicable for this commodity, though potential pesticide residue levels in “Persimmon, Japanese” are similar to those of the commodities in pome fruits.
9. Therefore, “Persimmon, Japanese” should be transferred from the tropical fruits group to the pome fruits group which has more group MRLs, in light of the agreement of the 42nd session of the CCPR, “the Committee endorsed the recommendation that CCPR should continue to progress the work on inclusion of new commodities in the Classification of Foods and Feeds ... in order to facilitate establishment of MRLs for minor uses.” (see para. 162, ALINORM 10/33/24)

Annex

Comparison of the numbers of Codex Group MRLs for citrus fruits, pome fruits and assorted tropical and subtropical fruits – edible peel

At the 43rd session of the CCPR, some delegations proposed to transfer kumquats (FT 0303) and limequats (FT 2325) from tropical fruits edible peel to the citrus fruits group and transfer persimmon (FT 0307) from tropical fruits edible peel to the pome fruits group. The Committee agreed that further consideration should be given to the consequences of such changes as regards the establishment of MRLs and these commodities were retained in square brackets for further consideration (see para. 96-97, REP11/PR).

The comparison of the current numbers of Codex MRLs for 3 commodity groups is shown in the following table. This table shows that approximately 60 group MRLs are currently established for both citrus fruits and pome fruits, while there are no group MRLs for assorted tropical and sub-tropical fruits –edible peel.

It is clear from this table that only a small number of MRLs would be available for minor crops such as kumquats, limequats and persimmons in the group for assorted tropical and sub-tropical fruits.

Recommendations

1. These commodities should be moved from the tropical fruits group to the corresponding group with similar characteristics and residue potential which has more group MRLs, in light of the agreement of the 42nd session of the CCPR, “the Committee endorsed the recommendation that CCPR should continue to progress the work on inclusion of new commodities in the Classification of Foods and Feeds ... in order to facilitate establishment of MRLs for minor uses.” (see para. 162, ALINORM 10/33/24)
2. It is proposed that where there are cases of other commodities being moved from one crop group to another, that an analysis such as this one is conducted to ensure that adequate MRLs are available and that unnecessary restrictions on trade do not occur as a result of the change.

Table. Numbers of Codex MRLs for 3 commodity groups (As of July 20, 2011)

	Citrus fruits	Pome fruits	Assorted tropical and sub-tropical fruits – edible peel
No. of MRL Total	79	108	13
No. of MRL for commodity group	59	60	0
No. of MRL for subgroup/individual commodity	1 (Lemon and limes) 2 (Mandarins) 10 (Orange, Sweet, Sour) 1 (Shadocks or pomelos) 2 (Grapefruit) 1 (Lemon) 3 (Mandarin)	29 (Apple) 19 (Pear)	1 (Date) 11 (Olives) 1 (Persimmon, Japanese)

(Source: <http://www.codexalimentarius.net/pestres/data/commodities/index.html>)

KENYA**APPENDIX VII****DRAFT REVISION OF THE CODEX CLASSIFICATION OF FOODS AND ANIMAL FEEDS: "HERBS" (At Step 6)****Code No. Commodity**

[HH 3200 Edible flowers

Calendula flowers, *Calendula officinalis* L.; Geranium (lemon, rose), *Pelargonium crispum* (P.J.Bergius) L'Her and *Pelargonium graveolens* L'Her; Common daisy, *Bellis perennis* L. and other edible flowers]

We support the classification of edible flowers as a fruit

Edible flowers in the country are mainly hibiscus used for flavouring teas, chamomile but on small scale.

APPENDIX VIII**PROPOSED DRAFT REVISION OF THE CODEX CLASSIFICATION OF FOODS AND ANIMAL FEEDS: "ASSORTED TROPICAL AND SUB-TROPICAL FRUITS EDIBLE PEEL" AND "ASSORTED TROPICAL AND SUB-TROPICAL FRUITS-INEDIBLE PEEL" (At Step 5)****ASSORTED TROPICAL AND SUB-TROPICAL FRUITS - INEDIBLE PEEL**

Class A Type 1 Fruits Group 006 Group Letter Code FI

1.[FT 0302 **Jujube, Chinese** *Ziziphus jujuba* Mill.]2.[FT 0303 **Kumquats** *Fortunella japonica* (Thunberg) Swingle; *F. margarita* (Loureiro) Swingle- **Kumquat, Marumi**, see Kumquats, FT 0303*Fortunella japonica* (Thunberg) Swingle- **Kumquat, Nagami**, see Kumquats, FT 0303*Fortunella margarita* (Loureiro) Swingle][FT 0369 Tamarind, see also Subgroup 28B Spices: Fruit or berry *Tamarindus indica* L., sweet varieties]

We Support MRLs development by Chinese countries as they are traded crops and their safety is our concern.

SENEGAL

Agenda Item	TITRE	OBSERVATIONS ET PROPOSITIONS	JUSTIFICATION
N° 7(b)	DRAFT REVISION OF THE CODEX CLASSIFICATION OF FOODS AND ANIMAL FEEDS AT STEP 7 : FRUIT COMMODITY GROUPE : EDIBLE FLOWERS AND ASSORTED TROPICAL AND SUB-TROPICAL- EDIBLE AND INEDIBLE PEEL	<p><u>Section assorted tropical and sub-tropical fruits – inedible peel :</u></p> <p>Add in sub-group <u>Desert date</u> called Sump in sénégal. The scientific name is <u><i>Balanites aegyptiaca</i></u></p>	<p>The desert date or sump in Senegal is a tree of the specie <u><i>Balanites</i></u> that grows and is cultivated among others in <u>Tropical Africa</u>. Its scientific name is <u><i>Balanites aegyptiaca</i></u>. It has different uses : food and medicinal..</p> <p>Fruit and leaves are part of of the diet of the local populations.</p> <p>The fruit, called <u><i>iboraghan</i></u> or <u><i>aboghar</i></u> in <u>Mali</u>, is generally used fresh by <u>succion</u>, after its <u>epicarp</u> is removed. The taste is sweet with a little bit <u>bitterness</u>. The consumption is close to the one of a <u>date</u> or a <u>candy</u>.</p> <p>(http://fr.wikipedia.org/wiki/Balanites_aegyptiaca)</p>