

CODEX ALIMENTARIUS COMMISSION



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



**World Health
Organization**

E

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.net

Agenda Item 7c

CX/PR 12/44/10-Add. 1

April 2012

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

44th Session

Shanghai, P. R. China, 23-28 April 2012

COMMENTS on the Proposed draft Revision of the Codex Classification of Foods and Animal Feeds at Step 4: Selected Vegetable Commodity Groups, submitted by Brazil, Canada, Japan, Republic of Korea and European Union

BRAZIL

Brazil has no objection to the proposed revision to the Codex Classification for Selected Vegetable Commodity Groups and supports its advance at step 4 for consideration by the 44th Session of the Codex Committee on Pesticide Residues.

CANADA

General Comments

It is noted that for a number of groups (and subgroups), the Codex revisions are different from those of the International Crop Grouping Consulting Committee (ICGCC). In order to facilitate the future use of the crop grouping revisions through the initiatives of the ICGCC and Codex, Canada supports consistency in the two initiatives as much as possible, although it is recognized that differences will occur.

Specific Comments

Countries were asked to review and provide comments on the above draft document which proposed revisions to the following vegetable commodity groups:

- **Group 010 Brassica (cole or cabbage) vegetables, Head cabbage, Flowerhead cabbages**
- **Group 006 Leafy vegetables (including Brassica leafy vegetables)**
- **Group 017 Stalk and Stem Vegetables**

Canada's position for revisions to Group 010 Brassica (cole or cabbage) vegetables, Head cabbage, Flowerhead cabbages:

Canada supports the proposed revisions to this commodity group but recommends that Kohlrabi be moved to the Stalk and Stem Vegetables Commodity Group as it has a bulb like stem and may have higher residues than the representative crops of Group 010 Brassica commodity group.

Canada's position for revisions for Group 013 Leafy vegetables (including Brassica leafy vegetables):

Canada recommends that a subgroup of leaves of root and tuber vegetables (human food) not be established for Group 013. Canada recommends that this subgroup be addressed at the same time that the root and tuber vegetables group is revised.

Canada supports the proposal that a new commodity group be established for the aquatic leafy vegetables given the unique growing conditions of aquatic vegetables and that a subgroup for aquatic leafy vegetables not be established for group 013 leafy vegetables.

Canada recommends that the leaves of trees, shrubs and vines not be included as a subgroup in group 006. There is limited international trade for these commodities and due to variable use patterns, the commodities are not easily grouped and should remain as distinct orphans.

Canada's position for revisions to Group 017 Stalk and Stem Vegetables:

Canada supports in principle the revision of group 017 but recommends that no subgroup 17C "Others" be established. As stated in the document, "some commodities could not be grouped in the subgroups Stems and Petioles or Young shoots and are placed in a subgroup of "Others". If there is no scientific justification for grouping these commodities together, it is suggested that they remain as orphan commodities.

It is also noted that there is a difference between the Codex and the ICGCC subgroups for this commodity group. Codex is proposing 3 subgroups: "Stems and Petioles", "Young Shoots" and "Others" while the ICGCC crop grouping scheme has 2 subgroups: "Stalk and Stem Vegetable" and "Leafy Petiole Vegetable". This difference in subgroups results in some commodities being placed in different groups depending on the subgroup classifications.

EUROPEAN UNION

Para 4: The EU agrees with the proposal to divide group 012 'brassica' into 3 subgroups, since various morphologies were inside the former codex classification. Subgroups will allow a better overview on residue interception and are also in accordance with EU classification (Regulation (EC) 600/2010).

Para 6:

The EU welcomes the proposal to move Chinese broccoli and Broccoli raab in the group of leafy brassica greens for reasons of morphology. Both commodities are closer to leafy crops in terms of residue interception and classification.

Para 7: The EU agrees with the proposal to move Chinese Cabbage (Pe-tsai type) to the Brassica vegetables group, subgroup Head Brassicas.

Para 8: The proposal to keep Kohlrabi as a separate group is fully supported.

In the case of kohlrabi it is noted that not only the tuber-like enlargement of the stem is consumed by humans but also the leaves. Generally higher residues are seen in leaves than in tubers. Therefore, it is proposed to add Kohlrabi leaves to the group 013B Brassica leafy vegetables.

Para 11:

The proposal of having a subgroup of leaves of trees, shrubs and vines is supported. In addition the proposal of having a subgroup of aquatic leafy vegetables is fully supported, as to their very specific and unique propagation conditions.

Para 13: If a subgroup aquatic leafy vegetable is created, we propose to also transfer watercress from the Brassica leafy vegetables group (013B) to this new subgroup.

Para 19 and 29:

While the regrouping of Witloof (chicory sprouts) from the group "stalk and stem vegetables" to the group "leafy vegetables" is supported it should be considered to put witloof into a separate sub-group. The growing practice of the sprouts is completely different from any of the crops mentioned.

Appendix I

Taking into the comment on para. 8 description of the portion of the commodity to which the MRL applies (and which is analysed) should be amended. The definition should read:

"Head cabbages and Kohlrabi: Whole commodity as marketed, after removal of obviously decomposed or withered leaves. Cauliflower and broccoli: flower heads (immature inflorescence only). Brussels sprouts: "buttons" only. Kohlrabi: "tuber-like enlargement of the stem" only.

Appendix II

Group 013A Leafy greens subgroup

VL 0477 Goosefoot

The EU wants to point to the fact that from some varieties of *Chenopodium* seeds are consumed like quinoa. Quinoa seeds are listed in the groups of Cereal grains in the Codex Classification.

Group 013B Brassica leafy vegetables

VL 0405 Kohlrabi leaves

It is proposed to add Kohlrabi leaves for the reasons given above (human consumption).

Group 013C Leaves of root and tuber vegetables

VL 0469 Witloof chicory (sprouts)

For the reasons given above it is proposed to delete witloof here and put it into a subgroup 013F.

Leafy vegetables:

Agretti (*salsola soda* Weinm.) should be included in Appendix II in Group 13A.

Appendix III

Group 017C Stalk and stem vegetables - Others

VS 3030 Prickly pear pads

It is proposed to check the code. VS 0356 seems to be more appropriate

Page 6: Chayote leaves are leaves of a fruiting vegetable. Chayote is also a root vegetable VR 0423 and a fruiting vegetable VC 0423. It must be considered if Chayote leaves better fit in a new subgroup of leaves of Cucurbitaceae, together with VL 0421 Balsam pear leaves. The code should be VL 0423 instead of VL 2792.

In the EU Classification VL 0465 Chervil is classified as fresh herb. It could be considered to move Chervil from the Leafy vegetables to the Herbs group.

In the EU new commodities are proposed to be included in Annex I. It could be considered if the commodities not mentioned in this revised group should be proposed to be included. These commodities are: Water clover (*Marsilea crenata* L. Presl.) and Bitawiri (*Cestrum latifolium* Lam.).

Stalk and stem vegetables






In the EU new commodities are proposed to be included in Annex I. It could be considered if the commodities not mentioned in this revised group should be proposed to be included. This is Acacia shoots (*Acacia pennata* (L.) Willd).

JAPAN

Group 013 Leafy Vegetables (including Brassica leafy vegetables)

VL 0479 Japanese greens

- VL 0479 Japanese greens in existing Codex Classification is a commodity group that includes several commodities such as *Chrysanthemum coronarium* L, Turnip greens, Mizuna, Indian Mustard and Komatsuna (see the following photographs).

<p><i>Chrysanthemum coronarium</i> L.</p> 	<p>Turnip greens</p> 	<p>Mizuna</p> 
<p>Indian Mustard</p> 	<p>Komatsuna</p> 	

- Japan supports to delete Japanese greens and to list only the individual commodities originally included in this commodity. However, as the proposed draft includes descriptions that do not accurately reflect the correct information on those commodities, Japan would like to propose the following amendments:

Commodity in Appendix II of CX/PR 12/44/10	Japan's Proposal	
	Proposal for amendments (shown in red)	Comments
VL 2747 Chrysanthemum, Edible leaved <i>Glebionis</i> spp.		
- Indian mustard , See Mustard greens, VL 0485 <i>Brassica juncea</i> (L.) Czern.		
VL 0485 Mustard greens <i>Brassica juncea</i> (L.) Czern		
- Kabuna , See Mizuna, VL 0481 <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt var. <i>piriviridis</i> L.H. Bailey	VL 0481 Kabuna, See Mizuna, VL 0481 <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt var. <i>piriviridis</i> L.H. Bailey	Kabuna, whose name is used as another name for Turnip greens, are different from Mizuna due to the difference in scientific names, though Kabuna is regarded as another name for Mizuna in the proposed draft. Japan suggests Kabuna should be deleted because it is already included in Turnip greens.
- Komatsuma , See Mizuna, VL 0481 <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt var. <i>piriviridis</i> L.H. Bailey	VL **** - KomatsunaKomatsuna, See Mizuna, VL 0481 <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt var. <i>piriviridis</i> L.H. Bailey	As "Komatsuma" in the proposed draft contains a spelling error, it should be replaced with "Komatsuna." This commodity is originated from Japan. "Komatsu" is derived from the name of the place of origin in Japan and "na" means leafy vegetables in Japanese.
- Mustard spinach , See Komatsuma	Mustard spinach, See KomatsunaKomatsuna	Komatsuna and Mizuna are separate commodities due to the difference in appearance and scientific names, though Komatsuna is regarded as another name for Mizuna in the proposed draft. Therefore, the scientific name of Komatsuna should be amended accordingly.
VL 0481 Mizuna <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt; <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt var. <i>piriviridis</i> L.H. Bailey	VL 0481 Mizuna <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt; <i>Brassica rapa</i> L. subsp. <i>nipposinica</i> (L.H. Bailey) Hanelt var. <i>piriviridis</i> L.H. Bailey	The scientific name of Mizuna should be amended in consistent with the above proposal on Kabuna and Komatsuna.
VL 0506 Turnip greens <i>Brassica rapa</i> L. subsp. <i>rapa</i> :		

REPUBLIC OF KOREA

We proposed '**Perilla leaves** (*Perilla frutescens* (L.) Britton var. *frutescens*)' would be included in the **Group 013A Leafy vegetables**.

In the para. 21, CX/PR 12/44/10, it was mentioned that 'Perilla leaves' were included in the revised Herbs group, as follow.

21. The Republic of Korea proposed some new commodities: Cham-ssuk, Dang-gwi, Gom-chwi, Perilla leaves (included in the revised Herbs group), San-ma-neul (is an Allium and should be included in the Bulb vegetable group), leaf and Sun-chea (Watershield) and synonyms of scientific names for Cham-chwi and Cham-na-mul.

But, the 'Perilla (*Perrilla frutescens* (L.) Britton var. *crispa*, HH 3215)' included in Herb is not the same with 'Perilla leaves (*Perilla frutescens* (L.) Britton var. *frutescens*)' we proposed.

The details are as below.

1. In a working document for Agenda 6c. Proposed Draft Revision of the Codex Classification of food and Animal Feeds, before the 42th CCPR, the scientific name of 'Perilla' was '*Perilla frutescens* (L.) Britton'.

But, we (Republic of Korea) propose to revise the scientific name from '*Perilla frutescens* (L.) Britton' to '*Perilla frutescens* (L.) Britton var. *crispa*', the full name, not to be confused to '*Perilla frutescens* (L.) Britton var. *frutescens*'.

Also, in our comments, we mentioned that we will propose “Perilla leaf (*Perilla frutescens* (L.) Britton var. *frutescens*)” to include in the future work about classification of leafy vegetables group.

In the 42th CCPR, our comment on ‘perillia’ included in herb group was adopted (see Figure 1, 2).

We would like to remind that ‘**Perilla (*Perilla frutescens* (L.) Britton var. *crispa*)**’ included in herb group is different from ‘**Perilla leaves (*Perilla frutescens* (L.) Britton var. *frutescens*)**’ we proposed.

2. ‘Perilla leaves (*Perilla frutescens* (L.) Britton var. *frutescens*)’ were used as a leafy vegetable in the Japan, Korean and so on, not as herbs. Korean has been taking the ‘perilla leaves’ as a leafy vegetable for a long time. Please refer the Supporting document in this word file, page 6-10. The vegetable have been exported to other countries as canned vegetable products.

So, we propose that ‘**Perilla leaves (*Perilla frutescens* (L.) Britton var. *frutescens*)**’ would be included in **Group 013A Leafy vegetables**.

3. We expect that the confusion between the two commodities (‘Perilla (*Perilla frutescens* (L.) Britton var. *crispa*)’ and ‘Perilla leaves (*Perilla frutescens* (L.) Britton var. *frutescens*)’) resulted from those same common names (‘Perilla’). Therefore, we would like to propose that the common name of ‘**Perilla leaves (*Perilla frutescens* (L.) Britton var. *frutescens*)**’ could be considered as ‘**Deul-ggaet-ip (*Perilla frutescens* (L.) Britton var. *frutescens*)**’.

We submitted comments as follow in the 42th CCPR. Please remind this.

**Proposed Draft Revision of the Codex Classification of
Food and Animal Feeds**

Comments on Agenda Item 6c (42th CCPR), Submitted by Korea

HH 3214 Perrilla

Comments of KOREA:

1. “Perrilla”, which is misspelled, is needed to revise to “Perilla”.

2. **It is recommended to revise from *Perilla frutescens* (L.) Britton to *Perilla frutescens* (L.) Britton var. *crispa*, the full name, not to be confused to *Perilla frutescens* (L.) Britton var. *frutescens*. Both varieties are used in Korea. In Korea, *P. frutescens* var. *frutescens* is treated as “leafy vegetable”, and *P. frutescens* var. *crispa* is treated as “herb”.**

Therefore, this commodity would be changed as follows;

HH 3214 Perilla

Perilla frutescens (L.) Britton var. *crispa*



Korea will propose “Perilla leaf” to include in the future work about classification of leafy vegetables group. Therefore, our comment that perilla classified as herb group would be applied.

As mentioned above, we propose the new commodity to include in the Leafy vegetables group.

Group 013 Leafy vegetables (including Brassica leafy vegetables)

VL ____ Perilla leaf

Perilla frutescens (L.) Britton

or *Perilla frutescens* (L.) Britton var. *frutescens*

HH 3214	Perilla
<hr/>	
ALINORM 10/33/24, Appendix X	
<i>Perilla frutescens</i> (L.) Britton var. <i>crispa</i>	

Figure1. A scientific name of 'Perilla' included in Herbs in the 42th CCPR report

In the 43th CCPR report, a scientific name of 'Perilla' included in Herb was *Perrilla frutescens* (L.) Britton var. *crispa*, as follow.

HH 3214	Pennywort
	<i>Centella asiatica</i> (L.) Urb.
-	Peppermint, see Mints, HH 0738
	<i>Mentha x piperita</i> L.
HH 3215	Perilla
	<i>Perrilla frutescens</i> (L.) Britton var. <i>crispa</i>
-	Phak ka yaeng, see Rice paddy herb, HH 3217
HH 3216	Phak paew
	<i>Trichodesma indicum</i> (L.) Sm.

Figure2. A scientific name of 'Perilla' included in Herbs in the 43th CCPR final report

Supporting documents for	
'Perilla leaves (<i>Perilla frutescens</i> (L.) Britton var. <i>frutescens</i>)'	

Group 013A Leafy vegetables

■ Outline of Perilla leaves

- Scientific name : ***Perilla frutescens* (L.) Britton var. *frutescens***
- Common name : Perilla leaf
- Local name : Deul-ggaet-ip(Korea), エゴマ(Japan)
- Traits : Stems densely villous. Leaves broadly ovate to orbicular, 7-13 × 4.5-10 cm, green or purple, adaxially pilose, abaxially appressed villous, margin coarsely serrate. Fruiting calyx to 1.1 cm, base villous, glandular. Nutlets gray-brown, ca. 1.5 mm in diam. Widely cultivated in China [Bhutan, Cambodia, India, Indonesia (Java), Japan, Korea, Laos, Vietnam] Seeds are a source of perilla oil. Leaves are used for flavoring dishes in India and China. In Korea, the leaves are used as one of major Ssam vegetable.
- Uses : Salad, pickle, Ssam.
- Origin : East Asia
- Memo : Perilla leaf is used as spice but, in Korea, the leaves are used as one of major Ssam vegetable. Korea proposes as a leafy vegetable.



■ Daily dietary intakes of perilla leaf in Korea

g/day

Group	Daily dietary intakes
Mean	2.3
20-29 year	2.1
30-49 year	3.1
50-64 year	2.9
65+	2.4

■ Cultivation of perilla leaf in Korea



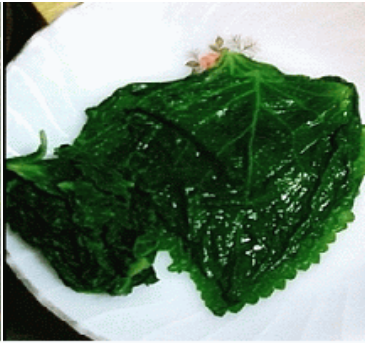
■ Ways of eating perilla leaf in which it is cooked and processed

1. Raw perilla leaf cleaned by washing is consumed by wrapping broiled or roasted meats such as beef and pork with it. The raw perilla leaf provides a good flavor.





2. Seasoned or unseasoned perilla leaf after blanching



3. Fried perilla leaf



4. Blanched perilla leaf is preserved in a seasoned soy sauce. This is homemade as well as produced from a canning process in food companies.



We proposed ‘San-ma-neul (*Allium victorialis* L.)’ would be included in the **Group 013A Leafy vegetables**.

In the para. 21, CX/PR 12/44/10, It was mentioned that ‘San-ma-neul’ should be included in the ‘Bulb vegetable group’, as follow.

21. The Republic of Korea proposed some new commodities: Cham-ssuk, Dang-gwi, Gom-chwi, Perilla leaves (included in the revised Herbs group), San-ma-neul (is an Allium and should be included in the Bulb vegetable group), leaf and Sun-chea (Watershield) and synonyms od scientific names for Cham-chwi and Cham-na-mul.

We confirmed the opinion from working group. But although the scientific name of 'San-ma-neul' is *Allium victorialis* L., The part of the 'San-ma-neul (*Allium victorialis* L.)' used by people are different from garlic included in Bulb vegetable group. In the Korea, leaves of 'San-ma-neul' have been used as a leafy vegetable (see page 2-3 in this document).

Therefore, we think it is possible that 'San-ma-neul' could be included in the leafy vegetables, considering the use of the 'San-ma-neul' as leafy vegetable in Korea.

Supporting documents for

'San-ma-neul, Leaf (*Allium victorialis* L.)'

Group 013A Leafy greens

■ Outline of **San-ma-neul, Leaf**

- Scientific name : *Allium victorialis* L.
- Common name : San-ma-neul, Alpine leek
- Local name : San-ma-neul (Korea), victory onion (U.S.), 葱 ge cong (China), Gyoujaninniku (Japan)
- Traits : Leaves 2 or 3; petiole 2–10 cm; leaf blade oblanceolate-elliptic to elliptic, 8–12 × 3–9.5 cm, base cuneate to broadly so, gradually narrowed into petiole, decurrent, apex acute or acuminate. *Allium* with two or three wide leaves. Leaves are used as vegetable.
- Uses : **Salad, Ssam, pickle, fry.**
- Origin : Northern Hemisphere



■ Supporting information I: A. San-ma-neul cultivation B. San-ma-neul flower



■ Supporting information II: A. Harvested San-ma-neul leaves B. Pickled San-ma-neul in soy sauce

We proposed 'flowering stalk of Garlic (*Allium sativum* L.)' would be included in the **Group 017A Stalk and stem vegetables - Stems and Petioles**.

In the para. 32, CX/PR 12/44/10, It was mentioned that the 'flowering stalk of Garlic' was included in the Bulb vegetables group, as follow.

32. The Republic of Korea proposed to include Water celery in this group. Also it was proposed to include the flowering stalk of Garlic. This commodity belongs in the group of Bulb vegetables.

As was stated above, we also indicate the garlic is included in the Bulb vegetable group. Of course, bulb of garlic have been used and classified as bulb vegetable in Korea. But, in Korea and other countries, the flowering stalk of garlic has been also used for a vegetable.

Before harvesting the bulb of garlic, growers cut off the flowering stalk to increase the bulb yield. In Korea, the flowering stalk of garlic is distributed in the market as a stem and stalk vegetable (Please refer the page 2-3 in this document).

Therefore, we think it is possible that 'flowering stalk of Garlic' could be included in 'Stalk and stem vegetables - Stems and Petioles', considering the use of stalks in Korea.

Supporting documents for

'Flowering stalk of garlic(Ma-neul-jong) (*Allium sativum* L.)'

Group 017A Stalk and stem vegetables - Stems and Petioles

■ Outline of Flowering stalk of garlic(Ma-neul-jong)

- Scientific name : *Allium sativum* L.
- Common name : Flowering stalk of garlic
- Local name : Ma-neul-jong(Korea), young stem of garlic(U.S.), garlic flower stalk(U.S.), suànháo(China), suàntái(China), ニンニクの茎(Japan)
- Traits : Ma-neul-jong, floral stalk of garlic, is a vegetable the same as the bulb of garlic. Ma-neul-jong has mild garlic scent and fresh green one is crispy. This food is a good source of plant fiber.
- Uses : Salad, pickle, fried mu-chim
- Origin : Central Asia



■ Supporting information I: A. Garlic cultivation; B. Flower and young floral stalk of garlic



■ Supporting information II: Ma-neul-jong, young floral stalk of garlic



■ Supporting information III: A. Ma-neul-jong salad; B. Pickled Ma-neul-jong in soy sauce; C. Fried Ma-neul-jong/shrimp mu-chim