CODEX ALIMENTARIUS COMMISSION





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Agenda Item 8b

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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 TABLE 2 AT STEP 4 – SELECTION AND EXAMPLES OF REPRESENTATIVE COMMODITIES (VEGETABLE COMMODITY GROUPS), submitted by Brazil, Canada, Costa Rica, European Union, Japan and Republic of Korea

BRAZIL

Brazil supports the Proposed Draft Table 2 on the selection and examples of representative commodities (vegetable commodity groups) and its advance at step 4 for consideration by the 44th Session of the Codex Committee on Pesticide Residues.

CANADA

Canada is in agreement with the proposed representative commodities for Group 009 Bulb Vegetables (*i.e.* Bulb onion and Spring onion). These representative commodities are consistent with the ICGCC's representative commodities for the revised Crop Group 3-07 Bulb Vegetables Group.

Canada is in agreement with having Broccoli or Cauliflower, and Cabbage as the representative commodities for Group 010 Brassica (cole or cabbage) vegetables, head cabbages, flowerhead cabbages. These representative commodities are consistent with those agreed upon at ChemSAC in December 2011 for ICGCC's revised *Brassica* Head and Stem Vegetable Crop Group 5. However, it is noted that:

- o Brussel sprouts is not a representative commodity in the ICGCC's revised *Brassica* Head and Stem Vegetable Crop Group 5.
- O Kohlrabi is not a member of the ICGCC's revised *Brassica* Head and Stem Vegetable Crop Group 5. It was decided that Kohlrabi would be included in the ICGCC's new Crop Group 22 (Stalk, Stem, and Leaf Petiole Vegetables), but is not a representative commodity.

Canada is in agreement with having tomato, sweet pepper, and chilli pepper or small variety of Eggplant as the representative commodities of Group 012 Fruiting vegetables, other than Cucurbits. These representative commodities are consistent with the ICGCC's representative commodities for the revised Crop Group 8-09 Fruiting Vegetables Group. However, it is noted that:

- O The three subgroups in the ICGCC's Crop Group 8-09 are A) Tomato Subgroup, B) Pepper/Eggplant Subgroup, and C) Nonbell pepper/Eggplant Subgroup and these differ slightly from the Codex proposed subgroups (A: Tomatoes, B: Peppers, and C: Eggplants).
- o The ICGCC specifies the representative crop tomato should include a standard size and one cultivar of small tomato.
- One cultivar of large variety of eggplant is not a representative commodity in the ICGCC's Crop Group 8-09.

Canada is in agreement with having Head lettuce, Leaf lettuce, Spinach, and Mustard greens as the representative commodities of Group 013 Leafy vegetables (including Brassica leafy vegetables). These representative commodities are consistent with those agreed upon at ChemSAC in December 2011 for the ICGCC's revised Leafy Vegetables Crop Group 4. However,

- O Canada recommends removing Kale as an alternative representative commodity for Group 013B Brassica leafy vegetables since it has much less production than mustard greens.
- O It is noted that, the ICGCC did not approve the inclusion of "Leaves of Root and Tuber, human food" subgroup into the revised Leafy Vegetables Crop Group 4 (ChemSAC, December 2011). They felt that it should remain in a separate crop group and any amendments to this group should be addressed together with revisions to the Root and Tuber Vegetables Group (Crop Group 1) in a future petition.

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It is also noted that the ICGCC's revised Leafy Vegetables Crop Group 4 does not include Leafy aquatic vegetables or Leaves of trees, shrubs, or vines. ChemSAC in May 2010 recommended that Leafy aquatic vegetables be a separate crop group due to unique growing conditions; and they recommended keeping Leaves of tree, shrub, or vine commodities as distinct orphans due to variable use patterns and limited international trade.

General Comments:

It is noted that for a number of groups (and subgroups), the Codex revisions and selected representative crops 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.

COSTA RICA

Costa Rica has examined the document and supports it.

EUROPEAN UNION

Group 010A. Residues found in broccoli are frequently higher than in cauliflower (ceteris paribus); hence extrapolation to the whole group 010A Flowerhead Brassicas should be based on broccoli. Residue data sets exclusively gained on cauliflower should not be extrapolated to broccoli. At least the word "or" should be deleted.

Group 010B. Residues in Brussels sprouts are expected considerably higher than in head cabbage given the significantly different volume/surface ratio. Extrapolation to the whole group 010B Head Brassicas should be based on Brussels sprouts and head cabbage; otherwise residues in Brussels sprouts may be underestimated when extrapolated from head cabbage data.

Group 010. Taking comments above into account, extrapolation for the whole group should be reconsidered.

Group 012. Extrapolation from tomato should be possible to eggplant according to EU guidelines on extrapolation

Group 013. General comment:

In case of crops being harvested at a very early stage (baby leaves) particular attention should be paid to this practice when setting an MRL.

Group 013A. Residue data obtained on head lettuce close to commercial harvest (finalised head formation) should be handled with care when extrapolation to open-head varieties. Likewise such data are not regarded as representative for open-head varieties or small leaf varieties, e.g. corn salad, spinach, goosefoot, etc. Therefore, it is proposed to delete "head lettuce".

Group 13C. Beet, garden leaves is chosen as representative commodity. Beet, garden leaves is not a commodity in this (sub)group. Witloof should be Witloof (chicory sprouts). Sweet potato should be Sweet potato leaves.

Group 013. Taking the comments above into account, extrapolation for the whole group should be reconsidered.

JAPAN

Japan appreciates the efforts of the United States of America and The Netherlands in leading the electronic working group on the revision of the Codex Classification of Foods and Feeds. We would like to provide the following comments:

Japan supports the early adoption of the *Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs to commodity groups including Table 1* would serve to help member countries to select representative commodities for each commodity group with a view to establishing Codex MRLs for commodity groups.

However, in the past discussion on the principles and guidance on the selection of representative commodities, the committee has not agreed to develop tables on selection and examples of representative commodities for all the other commodity groups after finalizing Table 1 on fruit commodity groups.

Japan is of the opinion that it is not appropriate to discuss contents of Tables 2 in detail at the 44th session of the CCPR for the following reasons:

- i. At the 43rd session of the CCPR, the committee agreed to entrust the electronic working group led by The Netherlands and the United States to proceed with the elaboration of new drafts of the groups for several types of vegetables for comments at Step 3 and consideration at the next session (see para.101, REP11/PR-Rev.), but not to develop Table 2 and:
- ii. As the revision of Codex Classification on vegetable commodity groups is at an early stage, inclusion of new commodity and/or transfer of commodities from one group to another may occur.

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REPUBLIC OF KOREA

APPENDIX

Table 2. Examples of the Selection of Representative Commodities -Vegetables

Codex Group / Subgroup	Examples of Representative Commodities	Extrapolation to the following commodities
Group 013E, Leafy aquatic vegetables		Leafy aquatic vegetables (VL 2054): Kangkung; Water mimosa; Water shield
Group 17A, Stems and petioles	Celery	Stems and petioles (VS 2081): Burdock, edible, tops?; Cardoon; Celery; Celtuce; Fennel, Bulb; Fuki-Giant butterbur; Rhubarb; Zuiki
Group 17C, Others		Artichoke, globe; Palm hearts; Prickly pear pads; Water-celery

Suggestion 1. 'Water shield' would like to be added in Table 2.

As the appendix II in the 'Proposed Draft Revision of the CODEX Classification of Foods and Animal Feeds at Step 4: Selected Vegetable Commodity Groups (Agenda 7(c), 44th CCPR)', the 'Water shield (VL2820)' would like to be included in the Group 013E, Leafy aquatic vegetables in table 2.

Suggestion 2. 'Fuki' would like to be change to 'Giant butterbur'.

As the appendix III in the 'Proposed Draft Revision of the CODEX Classification of Foods and Animal Feeds at Step 4: Selected Vegetable Commodity Groups (Agenda 7(c), 44th CCPR)', the 'Fuki' would like to be replaced with 'Giant butterbur (VS3021)' in table 2, because 'Giant butterbur (VS3021)' is a common name of 'Fuki'.

Suggestion 3. 'Water-celery' would like to be added in Table 2.

As the appendix III in the 'Proposed Draft Revision of the CODEX Classification of Foods and Animal Feeds at Step 4: Selected Vegetable Commodity Groups (Agenda 7(c), 44th CCPR)', the 'Water celery (VL3031)' would like to be included in the Group 17C, Others in table 2.

Table 2. Examples of the Selection of Representative Commodities -Vegetables

Codex Group / Subgroup	Examples of Representative Commodities	Extrapolation to the following commodities
Group 013 Leafy vegetables (including		
Brassica leafy vegetables)		
Group 013A, Leafy green	Head lettuce and Leaf lettuce and Spinach	Leafy greens (VL 2050): Amaranth; Aster, Indian; Blackjack; Cat's Wiskers; Cham-chwi;
		Cham-na-mul; Cham-ssuk; Chard; Chervil; Chicoly leaves; Chipilin; Chrysanthum, Edible
		leaved; Corn salad; Cos lettuce; Cosmos; Dandelion; Dang-gwi; Dock; Dol-nam-mul
		Ebolo; Endive; Fame flower; Feather cockscomb; Glasswort, common; Gom-chwi;
		Goosefoot; Iceplant; Jute; Lettuce, bitter; Lettuce, head; Lettuce; leaf; New Zealand
		spinach; Orach; Plantain leaves; Purslane; Purslane, winter; Sowthistle; Spinach;
		Spinach. Indian; Tanier spinach; Violet, Chines,
		Crown daisy(Chrysanthemum coronarium L.)

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Group 013B, Brassica leafy vegetable	<u>Mustard greens</u> or Kale	Brassica leafy vegetables (VL 0054): Broccoli, Chinese; Broccoli raab; Cabbage Abyssinian; Cabbage. Seakale; Chinese cabbage (type Pak-choi); Chiness flat cabage;
		Cress, garden; Cress, Upland; Flowering white cabbage; Hanover salad; Kale; Maca;
		Mizuna; Mustard, greens; Mustards, tuberous rooted; Purple-stem mustard; Radish
		leaves; Rape greens; Rucola; Rutabage greens; Shepherd's purse; Turnip greens;
		Watercress; Wild Rocket;
		Tatsoi (Brassica campestris var. narinosa);
		Leaf Brocoli (<i>Brassica oleracea var. botrytis aut italiana L.</i>); Chinese Cabbage (<i>Brassica rapa</i> , subsp. <i>pekinensis</i> and <i>chinensis</i>)

Suggestion 1. Crown daisy would like to be added in Table 2.

We have examined that the residue characteristics on 6 kinds of leafy vegetable with 10 pesticides.

The residues of 10 kinds of pesticide(imidacloprid and so on) in **spinach** are similar to the residues in **crown daisy** at 5 day after 2 times spraying with 7 day intervals.

Suggestion 2. Tatsoi, Leaf Brocoli and Chinese Cabbage would like to be added in Table 2.

- The residues of 10 kinds of pesticide(imidacloprid and so on) in Pak-choi are similar to the residues in Tatsoi and Chinese Cabbage at 5 day after 2 times spraying with 7 day intervals.
- The residues of 10 kinds of pesticide(imidacloprid and so on) in Leaf Brocoli at 2 day are lower than the residues in Tatsoi, Pak-choi and Chinese Cabbage at 5 day after 2 times spraying with 7 day intervals.