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FINAL

European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

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AGENDA ITEM 7(b)

Draft revision of the Classification of Foods and Animal Feeds at Step 3: Selected vegetable commodity groups (Group 011 Fruiting vegetables, cucurbits and Group 014 Legume vegetables)

(CX/PR 15/47/7)

European Union Competence

European Union Vote

The European Union (EU) would like to thank the electronic working group led by the Netherlands and the United States of America for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds for groups 011 (Fruiting vegetables, cucurbits and Group 014 Legume vegetables).

Paragraph 9 (Options for Group 011: Fruiting vegetables, cucurbits and Appendix I):

The EU agrees with the seven criteria which should form the basis of the revision of the classification. Within the seven criteria the EU considers criterion 1 (commodity's similar potential for pesticides residues), criterion 4 (edible portion), criterion 5 (similar GAP for pesticides uses and criterion 6 (similar residue behaviour) the most relevant ones.

The EU has analysed the three presented options in view of these criteria.

In line with that, the EU considers Option 3 the most appropriate option as it considers the edible portion of the crop. The EU expects that there are different levels of residues in the edible portion of cucurbits compared to the whole commodity as well as differences in residue behaviour that may influence the residue definition for risk assessment (e.g. different metabolites formed in pulp and peel).

By differentiation of cucurbits with edible and with inedible peel, the different residue potential as well as a potentially different residue behaviour can be taken into account when setting MRLs.

However, the EU acknowledges that the way cucurbits are consumed may depend on national eating habits. The EU is open to discuss other options if it can be shown that the impact on consumer exposure of such potential differences in residue potential and residue behaviour of cucurbits with edible and inedible peel are negligible.

A possibility to show this might be a comparison of intake calculations for some uses that will be evaluated in the next JMPR Meeting for fruiting vegetables – cucurbits. These calculations

should be done on cucurbits with inedible peel using a) the residues in the edible portion (with the appropriate residue definition of metabolites occurring in the edible portion) and b) the residues in the whole commodity (with the appropriate residue definition for the whole commodity).

Provided the outcome of the above mentioned calculation examples shows only small differences in exposure to consumers, the EU will reconsider its view and may be able to agree to

- an option in which subgroup 11A would be re-named into "Cucumbers and summer squashes" and subgroup 11B would be re-named into "Melons and pumpkins" and not to refer to "edibility" or "inedibility" of the peel.

Specific comment on the detailed commodities mentioned under the different options:

The specific commodities mentioned under paragraph 9 for the different options seem to be different depending on the option and do not match the list presented in the Appendix I. Completeness and consistency of all options with Appendix I needs to be checked.

Paragraph 10 (Options for Group 014: Legume vegetables and Appendix II):

The EU is in favour of the proposed Option 1 which divides Legume vegetables into four sub-groups.

The proposed division takes into account the sub group's similar potential for pesticides residues, similar GAP, similar residue behaviour and also the way legumes are consumed (with or without pods).