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Final European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

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AGENDA ITEM 7(c)

Draft revision of the Classification of Foods and Animal Feeds at Step 4: Other selected vegetable commodity groups – Group 20 (Cereal grains)

(CX/PR 15/47/8)

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 group 20 (cereals).

The EU strongly supports Proposal B as set out in Appendix III of the proposed classification for cereals.

The EU agrees with the seven criteria that are to be considered when establishing crop groups (Circular Letter 2014/16-PR). The EU is of the view that in case of Proposal A these criteria are not fulfilled and that proposal A groups together crops which have very different characteristics. This may lead to unnecessarily high group tolerances and is not in line with the ALARA principle.

While in the EU the classification of cereals is based on nine specific sub groups, the EU can generally support the Proposal B containing six specific crop groups with similar characteristics, but will need further investigations into the effects before taking a final decision.

Rationale for supporting Proposal B:

1) **Pseudocereals** such as buckwheat are taxonomically different from cereals, have different growth habits and different GAPs. Therefore, different herbicidal products are needed to take into account these differences. The EU is of the view that pseudocereals should be kept in a separate sub-group as proposed in Proposal B.

2) **Sweet corn** is very different from maize as it is harvested at a different stage of maturity. Sweet corn is harvested immature (succulent) while maize is harvested at the ripe (dry) stage. Due to this difference in production practice, the GAP, the potential for pesticides residues and the residue behaviour may be very different. Moreover, sweet corn has a much higher water content and is eaten like a vegetable, which has a direct influence on human exposure.

The EU agrees to move sweet corn from the current group "fruiting vegetables" to "cereals" since it clearly belongs to the cereals group, but insists on keeping sweet corn and maize in separate sub groups as proposed in Proposal B.

3) Wheat/rye and barley/oats:

The EU agrees to group wheat together with rye and barley together with oats. However, wheat/rye and barley/oats, respectively, should be kept in separate sub-groups as proposed in Proposal B. While for wheat the husks are completely removed during threshing, this may not be the case for barley. The residue behaviour for both crops may be very different. According to an analysis of the existing EU MRLs for barley and wheat, in residues tend to be higher in barley than in wheat.

The EU does not agree to group cereals together based on their size only, as proposed in Proposal A ("small grains").

Other comments:

1) There is some confusion over the terminology for "maize", "corn", "field corn" "sweet corn", "pop corn", etc. The EU suggests to introduce clear definitions at the beginning of the document of all the terms used.

Examples:

- In Proposal A "corn" is mentioned, while in option B, the term is "maize". We understand that the two terms are being used synonymously, but that should be clarified.
- In Table 3, Appendix II, the terminology is then "dried field corn", a term that was not mentioned before. Furthermore, sometimes it is "sweetcorn" and sometimes "fresh sweetcorn". To our understanding "maize" or "corn" are always the dry commodity while "sweet corn" is the succulent "fresh" kernel. The terms "fresh" or "dried" are not needed if a clear definition is introduced at the beginning.

2) Japan proposed to change the wording of Section 4.1 of CAC/GL 41-1993 "Analysis of Pesticides – Portion of Commodities to which MRLs apply and which is analysed".

Current wording: *"Whole commodity. Fresh corn and sweet corn: kernels plus cob without husk. (For the latter see Group 012 Fruiting vegetables, other than cucurbits)"*

Proposed wording: ***"Whole commodity in trade. Wheat, rye, triticale, maize, sorghum, pearl millet with husks readily separable from kernels during threshing: kernels. Barley oats, rice and other similar cereals with husks that remain attached to kernels even after threshing: kernels with husks (Note: for rice, only about 10% of traded grains is with husk). Fresh corn and sweet corn: kernels plus cob without husk."***

The EU does not agree to the wording proposed by Japan. In the EU the MRLs for cereals apply to the whole grain (kernel without husk) which is the commodity analysed by laboratories. If husks are partly analysed together with the kernel, the residues can be considerably higher and existing MRLs are likely to be exceeded more frequently.

3) The tables 3 in Appendix II and Appendix III list the examples for representative commodities. In the second column the commodities should not be separated by a comma, but by an "and" in line with the format of Appendix I, Table 2 of document CX/PR 15/47/9 (e. g for bulb vegetables, brassica vegetables, leafy vegetables, etc.)

Example for proposal B, Table 3, first line for Group 020 cereal grains, second column:

Instead of "Wheat, Barley, Rice, Maize, sorghum or Millet, Buckwheat and Sweet corn" the entry should read: "Wheat and Barley and Rice and Maize and Sorghum or Millet and Buckwheat and Sweet corn".

4) The EU proposes the following detailed changes to the commodities listed in Proposal B (Table 3 of Appendix III):

20A Wheat

- Delete: "Canary grass, Annual?; Cram-cram?; Fonio, black?; Fonio, white?; Huauzontle?; Inca wheat?; Job's tears?; Teff?"
- Delete the "?" in: "Triticale?"
- Add: "Spelt"

Proposed group 20 A Wheat: "Rye; Spelt; Triticale; Wheat"

20B Barley

Delete: " Canary grass, Annual?; Fonio, black?; Fonio, white?; Huauzontle?; Inca wheat; Job's tears?; Teff?; Triticale?"

Delete the "?" in: "cram-cram?"

Proposed group 20 B Barley: " Barley; Oats, Cram-cram"

20C Rice

"Rice, wild" should be renamed into "Wild rice".

Proposed group 20C Rice: "Rice; Rice, African; Wild rice"

20D Maize, millet, sorghum

Add: "Canary grass, Annual; Fonio, black; Fonio, white; Job's tears; Sudan grass; Teff" .

It is in our view not necessary to mention all millet varieties separately as they are covered by "millet".

Proposed group 20D "Maize, millet, sorghum": "Maize, millet, sorghum, popcorn, Teosinte, Canary grass, annual; Fonio, black; Fonio, white; Job's tears; Sudan grass; Teff; Teosinte"

20E Pseudocereal grains

Add: "Huazontle"

Proposed group 20E "Amaranth, Grain; Amaranth, Purple; Buckwheat;
Buckwheat, Tartary; Canihua; Chia; Huauzontle; Inca wheat; Princess-feather;
Psyllium; Psyllium, blond; Quinoa"

20F Sweet corn

Proposed group 20F sweet corn: "sweet corn"