

European Union Comments
CODEX COMMITTEE ON PESTICIDE RESIDUES
52nd Session

CL 2020/10-PR

**REQUEST FOR COMMENTS AT STEP 3 ON THE REVISION OF THE
CLASSIFICATION OF FOOD AND FEED (CXA 4-1989).
CLASS C - PRIMARY ANIMAL FEED COMODITIES**

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) on the Revision of the Classification of Food and Feed chaired by the United States of America and co-chaired by the Netherlands for the preparation of the draft on the revision of the Codex Classification of Foods and Animal Feeds (CX/PR 20/52/6 and CX/PR 20/52/9).

The EU suggests the following modifications to document **CX/PR 20/52/6**:

- In pages 4 and 12, for the Type 11 Primary feed commodities of plant origin, the EU notes that the coding *AS* is used in all *silage* commodities and this code should be replaced by the letter code *AF*. According to page 4, the letter code *AS* is foreseen for Groups **051B** to **051D** while the Group **051A** (forage and silage) should be coded with the letters *AF*.
- In page 17, the commodity coded *AM 0165: Miscellaneous feed products except leguminous and grass plants (Gramineae), but including grasses for sugar production from the subgroup 052A: miscellaneous feed products with high water (≥ 20%) content (forage, beet tops)* should be deleted for the following reasons:
 - This exception is covered by the description of Group **052**, as well as the inclusion of *grasses for sugar production*.
 - Codes starting with the letters *AM* belong to the Subgroups **052B** and **052C**.
 - No CXL has been set for *AM 0165* so far.
 - All commodities of the entire group are covered by the specific group codes *AV3307*, *AM 3308* and *AM 3309* of the three subgroups.
 - According to CL 2020/12-PR the setting of a group CXL for the whole Group **052** or its subgroups is not possible.
- In page 18, the entry “*Canola, meal, see AM 3580 rape seed, meal Brassica spp*” should be corrected with “*Canola, meal, see AM 3578 rape seed, meal Brassica spp*”. The EU partially supports the document **CX/PR 20/52/9** and suggests the following amendments:

- In page 2 of Appendix I, the subgroup coded *AM 3309 Subgroup of Processed Products (such as meal, hulls, dried pulps, molasses)* should be included.
- In page 3 of Appendix I, the text on *New commodities* is not aligned with the one reported in CX/PR 20/52/6 and should therefore be revised. The following codes need to be added to the database:
 - *AL 3493 – AL 3532*
 - *AF 3533 – AF 3550*
 - *AS 3552 – 3564*
 - *AV 3565 – 3569*
 - *AM 3570 – AM 3581*

The EU would like to thank Japan for the work to clarify the term fodder and for the investigation on the available residue data as the basis for former CXL setting. The investigation identified some problems that can be solved with the periodic re-evaluation of the active substances following the adoption of the new classification for Class C.