

CODEX COMMITTEE ON PESTICIDES RESIDUES
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European Union proposal for

Agenda Item 14

Other business

European Union Competence
European Union Vote

The European Union (EU) would like to take this opportunity to propose some issues it considers relevant under this agenda item.

The EU requests clarification on the publication date for the announced comprehensive document comprising the new Revision of the Classification for food and feed.

It is also recommended:

- In line with the decision of CAC46 (2023), to update the *Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups, CXG 84-2012* (last modified in 2017), including the agreed extrapolations for Class B, C, D and E.
- to revoke, as soon as possible, the Codex Classification of foods and animal feeds of 1993, which is still available on the Codex Alimentarius website¹.

Furthermore, the EU would like to seek clarification on the implementing plan of the new food classification for plant and animal products.

For animal products, the EU noted several discrepancies with previous decisions during the evaluation of the JMPR report 2023. For example, the new codes for animal products were not used consistently and MRL proposals were still derived for ‘meat (from mammals other than marine mammals)’, and not for the new commodity ‘muscle (from mammals other than marine mammals)’.

The EU would like to ask clarifications if the existing Codex MRLs for meat will be reconsidered and replaced by new MRLs for muscle.

¹ Codex Alimentarius Volume 2 Pesticide residues in food (second edition), Section 2 : Codex classification of Foods and Animal Feeds. Rome 1993. https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXA%2B4-1989%252FCXA_004e.pdf

In addition, clarifications are required if the new commodity classification ‘muscle (from mammals other than marine mammals)’ will have an impact on the policy of setting Codex MRLs for fat soluble substances. Under the old classification, Codex MRLs for ‘meat (from mammals other than marine mammals)’ were flagged with the suffix (fat), indicating that the MRLs refer to fat. The ‘fat-soluble’ status determines the nature of a sample that should be taken for enforcement analysis. For fat soluble pesticides a portion of carcass fat is analysed and MRLs apply to carcass fat, and not to the meat. For non-fat soluble substances, the MRLs referred to meats (muscular tissue, including adhering fatty tissue, from animal carcasses prepared for wholesale distribution.).

It is not yet clear if JMPR will maintain the current practice and will propose MRLs for fat soluble substances for muscle, flagged with the suffix “(fat)” or whether different MRLs would be set for muscle and fat.

The EU also would like to get further information whether the existing Codex MRLs with obsolete (old) codes (which were replaced with new codes) will remain unchanged, or whether the old codes will be replaced with the new codes. Keeping old codes might cause confusion. If the old codes will be replaced by the new codes, it would be necessary to check the impact of the new commodity classification on those MRLs set for commodity groups that will have a different composition compared to the old commodity groups.

Some examples of cases where a commodity was moved from one group/subgroup to another group or subgroup are listed below:

- “Azaroles”: old code: FB 0280, classified in the group of “berries and other small fruits”; new code FP 2220, classified in the group of “pome fruit”.
- “Japanese persimmon”: old code: FT 0307, classified in the group “assorted tropical and sub-tropical fruits – edible peel”; new code FP 0307 classified in the group of “pome fruit”.
- “Chives”: old code HH 0727, classified in the group of “herbs”, new code VA 2605, classified in the group of “bulb vegetables”.

In certain cases, a reassessment of MRLs by JMPR would be required to ensure that CXLs are not lost for certain commodities (e.g., if a CXL for “herbs” is applicable to “chives”) and that the CXL for the new crop group is appropriated for certain commodities (e.g., if a CXL for “bulb vegetables” is appropriate for “chives”).

An update of the FAO manual reflecting the new food classification would be also desirable.