

28.03.2018

European Union Comments

CODEX COMMITTEE ON PESTICIDE RESIDUES

50th Session

Haikou, P. R. China, 9-14 April 2018

AGENDA ITEM 7

European Union Competence

European Union Vote

28.03.2018

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CODEX COMMITTEE ON PESTICIDE RESIDUES

50th Session

Haikou, P. R. China, 9-14 April 2018

AGENDA ITEM 7 (a)

Type 04: Nuts, seeds and saps

Draft Group 024: Seeds for beverages and sweets

Proposed draft Group 025: Tree saps

(CL 2018/12-PR)

(CL 2018/13-PR)

(CX/PR 18/50/6)

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.

The EU acknowledges the work done by the eWG to harmonise and to check the internal coherence of various decisions taken by the CCPR in the period 2010-2017 on the revision of the classification of food and feed, in particular of the commodities of the four groups of Type 4.

As regards group 024 'Seed for beverages and sweets' and group 025 'Tree saps', the EU is pleased that comments presented to the eWG have been taken into consideration and agrees with both the classifications of the two groups, as they are presented in the Appendices III and IV of the document CX/PR 18/50/6.

The EU notes that discussions on the group 022 'Tree nuts' were finalised in 2011 and on the group 023 'Oilseeds' in 2010. The two groups were pending at step 7, waiting for the finalisation of other groups of the same Type 4. Therefore, with a view to the common goal to

proceed with the revision of the Classification of Food and Feed, the EU will not oppose to the advancement of the entire revised Type 04 'Nuts, seeds and saps' to CAC41 (2018) for final adoption.

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AGENDA ITEM 7 (b)

Type 05: Herbs and Spices

**Draft Group 027 Herbs
Draft Group 028 Spices**

(CX/PR 18/50/7)

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.

The EU acknowledges the work done by the eWG to harmonise and to check the internal coherence of various decisions taken by the CCPR in the period 2004-2017 on the revision of the classification of food and feed, in particular of the commodities of Type 5.

The EU notes that discussions on the Type 05 'Herbs and Spices' were finalised in 2011, and the Type was pending at step 7, waiting for the finalisation of other types. Therefore, with a view to the common goal to proceed with the revision of the Classification of Food and Feed, the EU will not oppose to the advancement of the entire revised Type 05 'Herbs and Spices' to CAC41 (2018) for final adoption.

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AGENDA ITEM 7 (c)

Impact of the revised commodity groups and subgroups in Type 03, Type 04 and Type 05 on the Codex MRLs (CXLs) adopted by the Codex Alimentarius Commission

(CX/PR 18/50/8)

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 document CX/PR 18/50/8.

The EU has no comments to the information presented in the Appendixes I, II and III of the document and agrees that the proposed changes will be implemented in the Codex database, following the agreement on the revised classification of the Types 03, 04 and 05.

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AGENDA ITEM 7 (d)

Class C – Primary feed commodities
Type 11: primary feed commodities of plant origin
Proposed draft groups 050, 051, 052

(CL 2018-14-PR)

(CX/PR 18/50/9)

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 proposed draft on the revision of the Codex Classification of Foods and Animal Feeds.

The EU welcomes the start of the revision of the Class C: 'Primary animal feed commodities' and is pleased that its comments presented to the eWG have been taken into consideration in the document CX/PR 18/50/9. The EU confirms its support for:

- maintaining the forage commodities in the Codex Classification, even in case they are not traded (point 3 of CX/PR 18/50/9);
- replacing the generic term *fodder* with more specific commodity descriptors (hay or straw) (point 7 of CX/PR 18/50/9);
- dividing processed feed products and by-products of the food industry (pomace, pulp, molasses meal, cannery waste and similar) into separate groups (point 8 of CX/PR 18/50/9).

The EU would like to submit the following new comments on the document CX/PR 18/50/9:

- The numbering of the feed groups is not in line with the general lines followed for Class A. There are two groups with the number 051 and two with the number 052; two different letter codes are used in group 051 (AF/AS) and in group 052 (AV/AM).

- The difference between high water content products (forage) and low water content products (hay or straw) is properly reflected in the two groups 051 'Straw, fodder and forage of cereal grains and grasses (including buckwheat fodder)' and in the two groups 052 'Miscellaneous fodder and forage crops', but not in the group 050 'Legume animal feeds'.
- For processed feed products a new Class: 'Processed Feed of Plant Origin' will be the more correct option. However this solution would have a consequence on the numbering of all groups of the classification. An easier alternative is proposed, by creating a subgroup C for processed products, within each feed products group.

Taking into consideration the above comments, the following numbering and naming of the feed products is proposed:

CLASS C: ANIMAL FEED COMMODITIES

Type 11 Feed commodities of plant origin

Group 50 Legume feed products

- Subgroup 050A: products with high water content (forage)
- Subgroup 050B: products with low water content (hay)
- Subgroup 050C: processed products (like silage, meal, hulls)

Group 51 Cereal grains and grasses (including pseudocereals) feed products

- Subgroup 051A: products with high water content (forage)
- Subgroup 051B: products with low water content (hay, straw)
- Subgroup 051C: processed products (like silage, bran, hulls)

Group 52 Miscellaneous feed products

- Subgroup 052A: products with high water content (forage, beets, tops)
- Subgroup 052B: products with low water content (hay)
- Subgroup 052C: processed products like processing residues (meal, hulls, dried pulps), molasses)

The EU would like to submit further minor comments to document CX/PR 18/50/9:

- the explanatory note describing the terms *forage* and *fodder*, at the moment placed at the end of the Group 051, is extremely important for the understanding of the classification of both the groups 051 and 052. It could be better put upfront into the initial description of the group 051, where at the moment it is only indirectly mentioned by a reference 'see explanatory note below'.
- the exact nature of the commodity AS XXXX 'maize *stover*' in Group 051 is unclear. It is suggested to use it as a reference to a new commodity 'maize *straw*', as it has been done for other cereals.

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AGENDA ITEM 7 (e)

Proposed draft tables on examples of representative commodities for commodity groups in Type 04 and Type 05 (for inclusion in the Principles and guidance for the selection of representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity group (CAC/GL 84-2012))

(CL 2018/15-PR)

(CX/PR 18/50/10)

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.

The EU acknowledges the work done by the eWG to harmonise and to check the internal coherence of various decisions taken by the CCPR in the period 2010-2017 on the revision of the classification of food and feed, in particular of the commodities of Type 4 and Type 5 and would like to submit the following comments:

On Appendix I of CX/PR 18/50/10. Table 4: Examples of the selection of representative commodities. Type 04 (Nuts, Seeds and Saps):

As regards the group 022, the proposed representative commodities in table 4 for the group of tree nuts give insufficient guidance to choose a suitable representative crop. It is therefore suggested to limit the choice as follows: 'two commodities from almonds, chestnuts, pecan, pistachios and walnuts'. The proposed specification 'except coconut' is strongly supported.

As regards group 023 (point 4 in CL 2018/15-PR) the EU strongly supports the inclusion of the footnote 2), which acknowledges the impossibility to set representative commodities and a group-CXL for this subgroup. As a consequence, group 023 in the first column could be named 'Oilseeds and oil fruits except oilseeds from **subgroup** (not group) 023D'. Please note that in case this exception was agreed, the commodity 'American oil palm **seed**' (not 'American oil palm **fruit**') would need to be deleted in the third column of table 4.

On Appendix II of CX/PR 18/50/10. Table 5: Examples of the selection of representative commodities. Type 05 (Herbs and Spices):

As regards the subgroup 027A 'Herbs', the EU suggests as representative commodities 'Basil **or** mint or leaf lettuce or spinach', instead of 'Basil **and** mint or leaf lettuce or spinach'.

As for subgroup 028D 'Spices, root or rhizome', the EU agrees with the examples of representative commodities, but when fresh root and tuber vegetables are considered, an appropriate drying factor needs to be applied. The suggested representative commodities will become as follow:

'Any commodity in this subgroup or any commodity from the Root and tuber vegetables group, applying an appropriate concentration factor.'

Since the tables presented under agenda item 7(e) must be considered in the light of the decisions taken under agenda items 7(a) and 7(b), the EU will not oppose to the advancement of tables 4 and 5 – Examples on the selection of the representatives commodities for Type 4 and Type 5, to CAC41 (2018) for final adoption.

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AGENDA ITEM 7 (f)

Development of a system within the Classification of Food and Feed to provide codes for commodities not meeting the criteria for crop grouping

(CL 2018/21)

(CX/PR 18/50/11)

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 document CX/PR 18/50/11.

The EU confirms its preference for the Option 1, proposed in Appendix I of the document CX/PR 18/50/11, i.e. to create an additional type 'Miscellaneous' within each class. The footnote 1 is very important for the understanding of the proposed new type and it could be better put as an explanation at the beginning of the type.

As regards the subgroup 023D 'Other oilseeds' (point 3 of CX/PR 18/50/11), the EU believes that in this case the nature of the crops is clear and those species meet the criteria to be considered as oilseeds, but because of the inhomogeneity of the members of the subgroup proper examples of representatives commodities cannot be established for the entire subgroup. This is a different situation than the one of the true 'miscellaneous' commodities, which are those which do not meet any criteria of the other groups within the same type.