CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda Item 8(g) **CX/PR 16/48/12-Add.1**
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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COMMENTS at Step 3 on the proposed draft Proposed draft Table 2 and 3 - Examples of selection of representative commodities (vegetable and other commodity groups) (for inclusion in the Principles and guidance for the selection of representative commodities for the extrapolation of MRLs for pesticides to commodity groups) submitted by Australia, Canada, Kenya, Thailand, United States of America and African Union

Australia

In relation to Table 2 (as with the Fruits group), Australia proposes that the Vegetables Group does not progress to Step 8, without an analysis of the impact on CXLs of the transfer of commodities from one crop/commodity group to another.

Comments on Table 3: Examples of the Selection of Representative Commodities – Grasses

Australia proposes the following addition to Table 3

Group/Subgroup	Representative Commodities	Proposed Extrapolation
Group 020 Cereal grains	Wheat and Barley and Rice and Maize and Sweet corn	**Wheat and barley and/or oats and/or rice and/or maize and/or sweet corn**
Group 020B Barley and similar grains	Barley	Barley and oats

The addition of ***and/or*** allows greater flexibility with respect to the number of crop trials required to obtain a crop group MRL which will depend on those commodities that are major with respect to production and export in the various regions.

Canada

Background:

The 47th Session of CCPR (May 2015) agreed to re-establish the Electronic Working Group on the revision of the Classification of Food and Feed (EWG) to continue with the revision of the Classification. The representative commodity tables were not discussed at the 47th session of the CCPR because legumes, pulses, cucurbits and cereal grains were not completed. Table 2 has been updated to reflect additions to Groups 011 Fruiting vegetables, Cucurbits, 014 Legume vegetables and 015 Pulses. Table 3 is presented for the first time for Type 03 Grasses.

Current Status:

Codex members and observers have been asked to submit comments on the commodity groups as presented in Appendix I (Table 2 – Vegetable commodity groups) and Appendix II (Table 3 – Grasses) and to advance these proposals for adoption at Step 5 by the 39th Session of the Commission.

Canada's Position on the Revised Table 2 for Vegetable Commodity Groups and the New Table 3 for Grasses

In general Canada supports the proposed revisions to Table 2 and the new Table 3, and provides the following comments/observations:

- Canada supports the selection of representative crops for the revised bulb vegetables (Group 009), Brassica vegetables (Group 010), fruiting vegetables other than cucurbits (Group 012), leafy vegetables including Brassica leafy vegetables (Group 013), root and tuber vegetables (Group 016), stalk and stem vegetables (Group 017), and edible fungi (Group 018).
- As the subgroups for Group 011 (Fruiting vegetables, Cucurbits), Group 020 (Cereal Grains), Group 014 (Legume vegetables), Group 015 (Pulses), and Group 021 (Grasses for sugar and syrup production) have not yet been agreed upon and will be discussed during this session of CCPR, the choice of representative crops for these groups should take into consideration the discussions under Agenda Items 8(a) – 8(e).
- Although Group 011 (Fruiting vegetables, Cucurbits) will be discussed at CCPR48, Canada supports the proposed compromise solution under Agenda Item 8(c); CX/PR 16/48/8. The proposed compromise has 2 subgroups; Subgroup 011A - Fruiting Vegetables, Cucurbits such as Cucumbers and Summer Squashes and Subgroup 011B - Fruiting Vegetables, Cucurbits such as Melons, Pumpkins and Winter Squashes.
    - Canada supports Cucumber and Summer Squash as the representative crops of Subgroup 011A.
    - Canada supports Melon and/or Watermelon as the representative crop of Subgroup 011B.
    - However Canada does not support Pumpkin or Winter Squash as a representative crop of Subgroup 011B. Canada does not feel that residue data from an additional representative crop is necessary.
        - Based on a review of the residue data used to support Codex MRLs on the Fruiting Vegetables, Cucurbit Crop Group where data were available for cucumber, summer squash, melon and either winter squash or pumpkins, the highest residues were found in melons.
        - Therefore it is expected that residues in melons as the representative crop would cover potential residues in winter squashes/pumpkins.
- Canada supports the selection of the proposed representative commodities for the revised legume vegetables (Group 014) with the exception of Subgroup 014B.
    - For Subgroup 014B (Peas with Pods) the proposed representative crops are “Peas with pods (Garden pea or podded pea)” **and/or** “Beans with pods (*Phaseolus* spp.)”.
    - Canada feels it would be appropriate to only have “Peas with pods (Garden pea or podded pea)” as the representative commodity of this subgroup and not have “Beans with pods (*Phaseolus* spp.)” as an additional or alternative representative crop.
    - In Canada, separate residue field trial data are required for peas and beans. Pea data is typically not used to support beans and bean data is not used to support pea registrations.
    - A comparison of EU MRLs between beans (with pods) and peas (with pods) found that there were 35 pesticides (out of 465) where MRLs were different between these 2 commodity types. There was no consistency of residues being higher in beans (with pods) vs. peas (with pods) or vice versa.
    - Therefore there is the possibility that by using “Beans with pods (*Phaseolus* spp.)” as the representative crop for Subgroup 014B (Peas with Pods) may underestimate residues in podded peas.
- Canada supports the selection of the proposed representative commodities for the revised pulses (Group 015).
- Canada supports the selection of the representative crops Wheat, Barley, Maize, Sweet Corn, and Rice for the revised cereal grains group (020). It is noted that the proposed representative crops for Group 020 remain unchanged regardless of whether the Canadian Proposal or the Japanese Proposal is selected as the subgrouping criteria under Agenda Item 8(d) – CX/PR 16/48/9.

Kenya

Issue: Proposed representative commodities for vegetable commodity groups and for grasses groups as presented in tables 1 and 2.

Position: Table 2: subgroup 12C, eggplants; tomatoes to be excluded as a representative commodity.

Rationale: Tomatoes are representative commodities in subgroup 12A and therefore cannot be representative commodity for eggplants.

Thailand

Thailand has no objection on this proposed draft table 2. However, we would like to share the following comments.

1. **Group 14 Legume Vegetables**

We would like to propose the addition of "or *Vigna* spp." in the examples of representative commodities of group 14 Legume vegetables, subgroup 14A Beans with pods and 14C Succulent beans without pods. This is because that this commodity is widely cultivated and there are similarities between *Vigna* spp. and *Phaseolus* spp. on the growth habit, the pest problems and the pesticide use patterns. Additionally, we would like to propose the addition of "peanut (immature)" in the examples of representative commodities of subgroup 14E: Underground beans and peas because this commodity is widely cultivated. Besides, we would like to propose the deletion of "and/or Beans, with pods (*Phaseolus* spp.)" from the representatives commodities of subgroup 14B.

2. **Group 015: Pulses**

We recognize that Bean, *Vigna* spp., is widely cultivated and there are similarities between *Vigna* spp. and *Phaseolus* spp. on the growth habit, the pest problems and the pesticide use patterns. Thus, we would like to propose the addition of "or *Vigna* spp" in the examples of representative commodities of group 15 Pulses**,** subgroup 15A Beans, dry. We also would like to propose the deletion of "and/or Peas, dry (*Pisum* spp.)" and "and/or Beans, dry (*Phaseolus* spp.)" from the representatives commodities of subgroup 15A and subgroup B respectively.

The proposed amendment should be read as the following table.

Codex Group / Subgroup	**Examples of Representative Commodities**	**Extrapolation to the following commodities**
14 Legume vegetables	Beans with pods (*Phaseolus* spp. **or *Vigna* spp.**) and/or Peas with pods (Garden pea or podded pea) and Succulent beans without pods (*Phaseolus* spp. **or *Vigna* spp.**) and Garden pea	Legume vegetables (VP 0060): Beans (*Phaseolus* spp.); Beans (*Vigna* spp.); Beans, shelled (*Phaseolus* spp.); Beans, shelled (*Vigna* spp.); Bambara groundnut; Broad bean; Catjang; Chick-pea; Common bean; Cowpea; Garden pea; Goa bean; Grass pea; Guar; Jack bean; Lablab bean; Lentil; Lima bean; Lupin; Moth bean; Mung bean; Peas; Peas, shelled; Pigeon pea; Podded pea; Rice bean; Scarlet runner bean; Soya bean; Stink bean; Sword bean; Urd bean; Velvet bean; Winged pea; Yard-long bean;
Subgroup 14A Beans with pods	Beans with pods (*Phaseolus* spp. **or *Vigna* spp.**)	Beans with pods (VP 2060): Beans (*Phaseolus* spp.); Beans (*Vigna* spp.); Broad bean; Catjang; Common bean; Cowpea; Goa bean; Guar; Jack bean; Lablab bean; Moth bean; Mung bean; Rice bean; Scarlet runner bean; Soya bean; Stink bean; Sword bean; Urd bean; Yard-long bean
Subgroup 14B Peas with pods	Peas with pods (Garden pea or podded pea) ~~**and/or Beans with pods (*Phaseolus* spp.)**~~	Peas with pods (VP2061): Peas; Ben Moringa; Chi-pea; Garden pea; Grass pea; Lentil; Pigeon pea; Podded pea; Winged pea
Subgroup 14C Succulent beans without pods	Succulent beans without pods (*Phaseolus* spp. **or *Vigna* spp.**)	Succulent beans without pods (VP 2062): Beans, shelled (*Phaseolus* spp.); Beans, shelled (*Vigna* spp.); Broad bean, shelled; Catjang; Common bean; Cowpea; Goa bean; Jack bean; Lablab bean; Lima bean; Lupin; Moth bean; Scarlet runner bean; Soya bean; Stink bean; Velvet bean

Codex Group / Subgroup	**Examples of Representative Commodities**	**Extrapolation to the following commodities**
Subgroup 14D Succulent peas without pods	Garden pea	Succulent peas without pods(VP 2063): Peas, shelled; Chick-pea; Garden pea; Lentil; Pigeon pea
Subgroup 14E Underground beans and peas	Bambara groundnut? **or peanut (immature)**	Underground beans and peas (VC 2064): Bambara groundnut; Peanut (immature)
Group 15 Pulses	Beans, dry (*Phaseolus* spp. **or *Vigna* spp.**) and/or Peas, dry (*Pisum* spp.) and Soya bean, dry and ?	Pulses (VD 0070): Beans (*Phaseolus* spp.); Beans (*Vigna* spp.); Adzuki bean; African yam bean; Bambara groundnut; Broad bean; Chick-pea; Common bean; Cowpea; Field pea; Goa bean; Grass-pea; Guar; Horse gram; Jack bean; Kersting's groundnut; Lablab bean; Lentil; Lima bean; Lupin; Morama bean; Moth bean; Mung bean; Peas; Pigeon pea; Rice bean; Scarlet runner bean; Soya bean; Tepary bean; Urd bean; Velvet bean; Winged pea
Subgroup 15A Dry beans	Beans, dry (*Phaseolus* spp. **or *Vigna* spp.**) ~~**and/or**~~ ~~**Peas, dry (*Pisum* spp.)**~~ and Soya bean, dry	Dry beans (VD 2065): Beans (*Phaseolus* spp.); Beans (*Vigna* spp.); Adzuki bean; African yam bean; Broad bean; Common bean; Cowpea; Goa bean; Guar; Horse gram; Jack bean; Lablab bean; Lima bean; Lupin; Morama bean; Moth bean; Mung bean; Rice bean; Scarlet runner bean; Soya bean; Tepary bean; Urd bean; Velvet bean; Winged pea
Subgroup 15B Dry peas	Peas, dry (*Pisum* spp.) ~~**and/or Beans, dry (*Phaseolus* spp.)**~~	Dry peas (VD 2066): Peas; Chick-pea; Field pea; Grass-pea; Lentil; Pigeon pea
Subgroup 15C Dry underground legumes	?	Dry underground legumes (VD 2067): Bambara groundnut; Kersting's groundnut

United States of America

The United States notes that for Subgroup 14B Peas with pods both peas with pods and/or beans with pods are listed as a representative commodity. However, the U.S. thinks that only peas with pods is an appropriate representative commodity for Subgroup 14B Peas with pods. Additionally, Subgroup 15A Dry beans has both beans, dry and/or peas, dry along with Soya bean, dry listed as a representative commodity. However, the U.S. thinks it is only appropriate to have beans, dry and Soya bean, dry be the representative commodities for the Subgroup 15A Dry beans.

As noted in agenda item 8(c), the United States does not agree with the proposed representative commodities for the Group 011 - Fruiting vegetables, cucurbits of cucumber, summer squash, melon and /or watermelon **and** pumpkin or winter squash. The United States does not believe that the requirement of residue field trial data on winter squash or pumpkin is appropriate. The United States can only agree to the compromise option for Group 011 - Fruiting vegetables, cucurbits discussed under agenda item 8(c), if the residue field trial generated for melon can be used to represent winter squash and pumpkin or if the representative commodity is melon or pumpkin or winter squash. Based on the principles of crop grouping, the United States believes melon would be the best crop to represent the subgroup since it typically has the shorter pre-harvest interval (PHI), the netting on the rind will result in higher residues and the consumption of melon is higher than pumpkin or winter squash.

The main purpose of this crop grouping effort is to allow for the use of crop groups to establish tolerances for multiple commodities, especially minor and specialty crops, based on data from representative commodities. In the United States, winter squash and pumpkin have been represented by cucumber and summer squash since 1995 without any indication that the tolerances established have not been protective. The United States believes that requiring additional residue field trial data for winter squash or pumpkin is not necessary and that having these additional data will not be informative. Further, requiring these data will likely result in fewer pest control tools for growers.

This additional data requirement is not considered acceptable since the U.S. Delegation does not believe requiring the additional residue field trial data for pumpkin or winter squash will be in any way informative; that the current acceptance of data for cucumber, melon, and summer squash to support the Group 011- Fruiting vegetables, cucurbits is in any way under representing potential pesticide exposures for gourds, pumpkins and winter squashes; or that having the additional field trial data on the winter squash or pumpkin will make the world's food supply safer. Instead, the United States is concerned that this will result in fewer pesticide options for growers of gourds, winter squashes and pumpkins since registrants and even IR-4 (U.S. federally funded project to provide pest management tools for specialty crop and minor use growers) cannot justify the additional expense of conducting additional residue field trials on pumpkin or winter squash.

Background

The United States has had a crop grouping system in place since 1962. The initial crop grouping scheme has been updated and replaced and the current crop grouping scheme that has been in place since 1995 is undergoing revisions. Beginning in 2002, the United States and Canada have been involved in an effort to revise the existing crop grouping scheme in the United States and Canada. The United States and Canadian Delegations to the CCPR have an ongoing and continued effort to try to harmonize the NAFTA crop groups and representative commodities with those being developed by the CCPR. The goals of coordinating the North American activity with Codex are to minimize differences within and among the Unites States, Canada and Codex groups and to develop representative commodities for each group that will be acceptable on an international basis. These efforts are expected to lead to the increased harmonization of tolerances and maximum residue level (MRL) recommendations. This is important in facilitating trade.

The existing Cucurbit Vegetables Crop Group 9 in the United States consists of three representative commodities: cucumber, muskmelon, and summer squash and two subgroups: Melon subgroup 9A and Squash/cucumber subgroup 9B (refer to e-cfr Title 40 Part 180.41). The representative commodity for the Melon subgroup 9A is cantaloupes and the commodities in that subgroup are: Citron melon (*Citrullus lanatus* var. *citroides*); Muskmelon (hybrids and/or cultivars of *Cucumis melo*) (includes true cantaloupe, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon, and snake melon); and Watermelon (includes hybrids and/or varieties of *Citrullus lanatus*). The representative commodity for the Squash/cucumber subgroup 9B are one cultivar of summer squash and cucumber and the commodities in that subgroup are: Chayote (fruit) (*Sechium edule*); Chinese waxgourd (Chinese preserving melon) (*Benincasa hispida*); Cucumber (*Cucumis sativus*); Gherkin (*Cucumis anguria*); Gourd, edible (*Lagenaria* spp.) (includes hyotan, cucuzza); (*Luffa acutangula, L. cylindrica*) (includes hechima, Chinese okra); *Momordica* spp. (includes balsam apple, balsam pear, bitter melon, Chinese cucumber); Pumpkin (*Cucurbita* spp.); Squash, summer (*Cucurbita pepo* var. *melopepo*) (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini); and Squash, winter (*Cucurbita maxima; C. moschata*) (includes butternut squash, calabaza, hubbard squash); (*C. mixta; C. pepo*) (includes acorn squash, spaghetti squash). The existing Cucurbit Vegetable Group 9 in the United States has almost the same commodities as the existing Codex Group 011- Fruiting vegetables, cucurbits.

Since 1995, tolerances (MRLs) established for gourds, winter squashes and pumpkins in the United States have been primarily based on residue field trial data for cucumber and summer squash. There are many existing tolerances for the Cucumber Vegetable Group 9 and subgroups and there has been no indication that the tolerances established have been inadequate to cover the pesticide residues on gourds, winter squashes and pumpkins. To the contrary, the residues on cucumber and summer squash are expected to represent the highest potential residues since these commodities typically have a need for a shorter PHI than gourds, winter squashes and pumpkins. Additionally, in general, the smaller the fruit, the larger the ratio of surface area to weight; therefore, pesticide deposits on cucumber and summer squash are expected to be higher than on winter squash or pumpkin. Finally, cucumbers and summer squash are often eaten raw with the peel whereas, winter squash and pumpkins are cooked. Based on cooking studies submitted to the U.S. EPA for review, cooking typically results in the reduction of pesticide residues that may be found on a raw agricultural commodity.

As indicated in the table below, many of the current Codex MRLs for the Group 011- Fruiting vegetables, cucurbits have been established based on residue field trial data for cucumber, melon, and summer squash submitted by the United States and other countries. For the two chemicals (ametoctradin and penthiopyrad) where pumpkin and winter squash data were available, the JMPR concluded that the residues were not significantly different and noted that the datasets for melons, pumpkins and summer squash were similar. The additional commodities proposed for inclusion in the revised Group 011- Fruiting vegetables, cucurbits are: Chieh qua; Chinese cucumber; Cucumber, exploding; Cucumber, stuffing; Gac; Gourd, bitter snake; Gourd, buffalo; Gourd, fluted; Gourd, Malabar; Gourds, other; Gourd, pointed; Gourd, round; Indian spine gourd; Ivy gourd; Japanese snake gourd; Tacaco; African horned melon; Casabanana; Korean melon; Melon, nara; and Wax gourd (mature fruit). A review of the CAC adopted *GUIDANCE TO FACILITATE THE ESTABLISHMENT OF MRLS FOR PESTICIDES FOR MINOR CROPS* indicates that all of the commodities proposed for inclusion in Group 011- Fruiting vegetables, cucurbits fall under category 1 where there are no data in FAO Stat and No GEMS Food Cluster data. So these additional commodities are very minor crops. Therefore, the United States does not agree that the inclusion of these additional commodities into Group 011- Fruiting vegetables, cucurbits justifies that additional data needs to be developed on pumpkin or winter squash or that residue field trial data for cucumber, melon, and summer squash will underestimate potential pesticide residues on the proposed commodities.

Table 1. Chemicals with Existing Codex MRLs for Group 011- Fruiting vegetables, cucurbits

Chemical Name	JMPR Report (Year)	Location of field trials	Crops with Field Trial Data
Cyantraniliprole	2013	Canada	cucumber, melon, summer squash
Cyprodinil	2013	US, Spain, Italy	cucumber, melon, summer squash
Fludioxonil	2013	US	cucumber, melon, summer squash
Ametoctradin	2012	US, Canada, UK, Netherlands, France, Greece, Spain	cucumber, melon, summer squash, PUMPKINS (US only)
Dinotefuran	2012	US	cucumber, melon, summer squash
Methoxyfenozide	2012	US	cucumber, melon, summer squash
Penthiopyrad	2012	US, Canada	cucumber, melon, summer squash, WINTER SQUASH
Clothianidin	2010	US, Japan, Brazil	cucumber, summer squash
Flubendiamide	2010	US	cucumber, melon, summer squash
Novaluron	2010	US	cucumber, melon, summer squash
Thiamethoxam	2010	US, France, Netherlands, Spain, Italy	cucumber, melon, summer squash
Bosaclid	2009	*not specified*	cucumber, melon, summer squash
Buprofezin	2009	US	cucumber, melon, summer squash
Fluopicolide	2009	US, Estonia, Lithuania, Greece, Italy, Spain	cucumber, melon, summer squash
Hexythiazox	2009	Italy, Spain, Nether, France	cucumber, melon, summer squash

Chemical Name	JMPR Report (Year)	Location of field trials	Crops with Field Trial Data
Indoxacarb	2009	US, Southern EU	cucumber, melon, summer squash
Zoxamide	2009	US	cucumber, melon, summer squash
Azoxystrobin	2008	US, France, Germany, Greece, UK, Italy, Spain, Netherlands	cucumber, melon, summer squash
Chlorantraniliprole	2008	US, Canada	cucumber, melon, summer squash
Cyhalothrin	2008	Spain, Italy, France	cucumber, melon, summer squash
Cypermethrins	2008	US, Denmark, France, Germany, Greece, Italy, Netherlands, Spain, Belgium	cucumber, melon
Methomyl	2008	US, France, Netherlands	cucumber, melon, summer squash
Spirotetramat	2008	US, Canada	cucumber, melon, summer squash
Dimethomorph	2007	US, France, Germany, Greece, Italy, Spain, Hungary, Australia, Brazil, Israel	cucumber, melon, summer squash
Triadimefon/ Triademenol	2007	US, Australia, New Zealand, Japan, Mexico, Ukraine, France, Greece, Italy, Spain, Morocco	cucumber, melon
Bifenazate	2006	US	cucumber, melon, summer squash
Pirimicarb	2006	France, UK, Italy, Spain, Netherlands	cucumber, melon, summer squash
Propamocarb	2006	US, France, Greece, Italy, Spain, Germany, Netherlands	cucumber, melon, summer squash

African Union

Background:

During the 47th Session of the CCPR, the committee agreed to hold the tables at Step 2/3 for further discussion, comments and consideration at its 48th Session.

Position: AU agrees with the proposed changes reflected in Table 2 which have been updated to reflect agenda 8 (a,b,c,d). AU also agrees with table 3 proposed.

Issue & Rationale: These tables are in agreement with the position mentioned under agenda item 8(a,b,c,d,e and f).