

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

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REVISION OF THE CLASSIFICATION OF FOOD AND FEED: CLASS C: PRIMARY ANIMAL FEED COMMODITIES (AT STEP 4)

Comments submitted at Step3 in reply to CL 2019/01-PR
Submitted by European Union, Japan, Kenya, Republic of Korea and Thailand

European Union

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 2010-2018 on the revision of the classification of food and feed, in particular of the commodities of the three groups of Class C – Primary feed commodities.

The EU welcomes the new structure of the feed commodities with a differentiation in high and low water content and processed products. The EU proposes to distinguish between high and low water in terms of percentage of water content (e.g. low water content < 20% and high water content ≥ 20%). Moreover, the EU proposes to align the introductory description within Groups 050, 051 and 052, concerning the fact that MRLs should preferably be set and expressed on a “dry-weight” basis. For the purpose, the wording currently reported for Group 50 should be used.

The EU does not understand the benefits of separating grasses from cereal grains within Group 51 nor the need to distinguish between cool and warm grasses. However, since such separation will not pose a major impact in the EU, except for an increase in terms of administrative burden, the EU does not oppose the proposal being made. The EU recalls that the term “grasses” is already attributed to Type 03. In case a new subgroup will be created a different name could be used such as “grasses for feeding only”.

Japan

We appreciate the efforts of the USA and the Netherlands as chair and co-chair of the EWG on the revision of the Codex Classification of Food and Animal Feed and thank for the opportunity to comment on the draft discussion paper. We would like to submit the following comments.

- **Japan proposes that “silage” should be classified in subgroup 050A (products of legume feeds with high water content) and subgroup 051A (cereal grains and grasses (including pseudocereals) feed products with high water content).**
 - Silage is prepared by
 - (1) placing cut green vegetation in a silo or pit;
 - (2) piling the vegetation in a large heap and compressing it down so as to purge as much oxygen as possible, then covering it with a plastic sheet; or
 - (3) wrapping large round bales tightly in plastic film (see the Annex).

- CCPR agreed not to recommend MRLs for silage and forage, as they are not traded internationally. However, silage and forage are important feed items and their residue data are necessary for the calculation of animal dietary burdens and the estimation of maximum residue levels for foods of animal origin by JMPR.
- Silage generally has moisture content of 60 to 70% and is fed to livestock directly, like forage.
- In the absence of residues data on silage, residues data on forage can be used for silage (with adjustment for dry matter) .

• (Annex)

HOW TO MAKE A ROLL-BALE WRAPPED SILAGE



Roll-bales (forage: the moisture content is about 60%)



Roll-bales are wrapped tightly in plastic film by wrapping machine



Roll-bales allow to ferment for three weeks until it reaches pH 4



● **Japan proposes that the term “fodder” should be retained in the Codex classification.**

- Japan and other countries made the same comments at CCPR 50.
- MRLs for fodder have already been set not only by Codex but also by the USA and several other countries. If the term “fodder” is revised to more specific term such as hay, straw or other term without maintaining the term “fodder”, it will affect Codex MRLs and several countries’ MRLs.
- The term “fodder” and “forage” may mean a wide variety of goods. For this reason, the terms of “fodder” and “forage” are often used in a set.

If the term “forage” is retained in the Codex classification, the term “fodder” should also be retained. The Codex classification of “fodder” and “forage” are shown below.

Fodder: Coarse feed for livestock animals, especially cattle, horses and sheep, such as straw, hay, maize, stalks (stover) etc.

e.g. Maize fodder: stover or whole stalks (with ears removed) remaining after the harvest of the mature and sun-dried cobs.

Forage: Crops grown exclusively for animal feed. These crops are either used for grazing or are prepared as silage or as dry fodder.

e.g. Maize forage: whole green plant, prior to maturity (including the immature or nearly mature cobs).

● **Propose relatively modest amendment.**

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AL 3366	Bean, lablab, hay , See Bean, hay AL0061 <i>Lablab purpureus</i> (L.) Sweet ssp. <i>purpureus</i>
-	Bean, mung, hay , See Bean, hay AL 3363 <i>Vigna radiata</i> (L.) Wilczek var. <i>radiata</i>
-	Bean, rice, hay , See Bean, hay AL 3363 <i>Vigna umbellata</i> (Thunb.) Ohwi & H. Ohashi
-	Bean, runner, hay , See Bean, hay AL 0061 <i>Phaseolus coccineus</i> L.
-	Bean, tepary, hay , See Bean, hay AL 0061 <i>Phaseolus acutifolius</i> A. Gray var. <i>acutifolius</i>
-	Bean, <u>curd</u>, hay , See Bean, hay AL 3363 <i>Vigna mungo</i> (L.) Hepper var. <i>mungo</i>
-	Bean, yardlong, hay , See Bean, hay AL 3363 <i>Vigna unguiculata</i> (L.) Walp. subsp. <i>unguiculata</i> group <i>sesquipedalis</i>

- Bean, urd, hay → Bean, curd, hay

Forage: Crops grown exclusively for animal feed. These crops are either used for grazing or are prepared as silage or as hay.

e.g. Maize forage: whole green plant, prior to maturity (including the immature or nearly mature cobs).

Hay and Straw:

Coarse feed for livestock animals, especially cattle, horses and sheep, such as straw, hay, maize, stalks (stover) etc. ~~e.g. Maize forage: whole green plant, prior to maturity (including the immature or nearly mature cobs).~~

~~Maize hay: stover or whole stalks (with ears removed) remaining after the harvest of the mature and sun-dried cobs.~~

- Straw, hay and stover can be called “fodder”, but there are differences in three terms.

“Straw” is a by-product of seed or grain production. For example, a farmer who grows wheat will harvest the grain; the dry plant that remains after harvest is straw.

In particular, by-product of corn (maize) and sorghum, the term of “Stover” is used. Stover is consisting of the leaves, stalks, and cobs of maize (corn) or sorghum.

“Hay” is grown for feeds specifically, and it’s cut before the plant goes to seed. hay will have more nutrients than straw.

AS 3304 **Subgroup of Cereal grains and grasses (including pseudocereals) feed products with low water content (hay, straw forage)**

- forage → hay, straw

Subgroup 051C, Cereal grains and grasses (including pseudocereals) feed products processed products (such as ~~silage~~, bran, hulls)

Code No. Commodity

AS 3305 **Subgroup of Cereal grains and grasses (including pseudocereals) feed products**

AS 0162 **Silage of cereal grains and grasses (including pseudocereals)**

Includes all commodities in this subgroup

AS 3513 **Barley, silage**

Hordeum vulgare L. subsp. *vulgare*

- **Corn, silage**, See Maize silage, AS 3514

Zea mays L.

AS 3490 **Maize, bran**

Zea mays L.

AS 3514 **Maize, silage**

Zea mays L.

~~AS 3515 **Maize, stover** → Move to 051B~~

~~*Zea mays* L.~~

- Maize, stover is not processed products.

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AM 3451	Potato, process residue, dehydrated <i>Solanum tuberosum</i> L. ssp. <i>tuberosum</i>
AM 3452	Potato, process residue, raw <i>Solanum tuberosum</i> L. ssp. <i>tuberosum</i>
AM 3453	Potato, process residue, wet <i>Solanum tuberosum</i> L. ssp. T <i>tuberosum</i>

- “T” is small character.

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DM 0596 → AM 0596	Sugar beet molasses MOVED FROM CLASS D <i>Beta vulgaris</i> L. subsp. <i>vulgaris</i>
AB 0596 → AM 0597	Sugar beet, pulp, dry MOVED FROM CLASS D <i>Beta vulgaris</i> <u>L. subsp.</u> <i>vulgaris</i> → <i>Beta vulgaris</i> L. subsp. <i>vulgaris</i>
AB 1204 → AM 1201	Sugar beet, pulp, wet MOVED FROM CLASS D <i>Beta vulgaris</i> <u>L. subsp.</u> <i>Vulgaris</i> → <i>Beta vulgaris</i> L. subsp. <i>vulgaris</i>
AM 3457	<u>Sugar beet, molasses</u> <i>Beta vulgaris</i> <u>L. subsp.</u> <i>Vulgaris</i> → <i>Beta vulgaris</i> L. subsp. <i>vulgaris</i>

- “Sugar beet molasses” is duplicated.
- “subsp.” is not italics.

Kenya

Comment: Kenya appreciates the work of the Electronic working group led by United States of America and Netherlands. Kenya supports the proposed classification of the Class C, Type II into the 3 Groups 50 (Legume feed products), Group 51 (Cereal grains and grasses (including pseudo-cereals) feed products; and Group 52 Miscellaneous feed products) as agreed by CCPR50.

Rationale: The proposed Groups are consistent with agreed principles of crop grouping; this will provide possibility of elaborating maximum residue limits for the commodities in the Group. Further the inclusion of a separate subgroup for Grasses (Subgroup 051D), which are different morphologically, hence are commodities with similar potential for pesticide residues. The separation of the Grasses Subgroup (051D) is not clear since the characteristics for crops grouping do not include “cool season and warm season”.

Republic of Korea

Comment. We would like to submit the following comments (1 crop)

Republic of Korea would like to propose the addition of **Italian Ryegrass** into **group 051C, Cereal grains and grasses (including pseudocereals) feed products (such as silage, bran, hulls)**.

Italian ryegrass (IRG) is a Gramineae crop with an annual and a biennial. IRG has a high nutritional value and palatability as livestock feed. In Republic of Korea (ROK), IRG is harvested at the heading stage, and then it is dried in the field for 2–3 days. The dried IRG is packaged in the form of packed silage with approximate 40% moisture. This IRG is widely fed to beef cattle. (See the following photographs).

Supporting information: culture, harvest and feeding of Italian Ryegrass**APPENDIX 1****Class C****Type 11. Primary feed commodities of plant origin****Group 051: Cereal grains and grasses (including pseudocereals) feed products****Subgroup 051C: Cereal grains and grasses (including pseudocereals) feed products processed products (such as silage, bran, hulls)****AS XXXX. Ryegrass, Italian, silage***Lolium multiflorum***Thailand**

We would like to provide comments as follows;

Specific Comments

- The addition of commodity in the Classification of Food and Feed.

We would like to add 2 commodities in Class C: Primary Animal Feed Commodities as follows;

1. Subgroup 050A Products with high water content (forage)

Brazilian stylo, brazilian lucerne, common stylo,

Stylosanthes guianensis

1. **Subgroup 050B**, Products of legume feeds with low water content (hay)

Brazilian stylo, brazilian lucerne, common stylo,

Stylosanthes guianensis

2. Subgroup 050C, Processed products of legume feeds (such as silage, meal, hulls)

Leucaena, milled,

Leucaena leucocephala

Rational: Thailand has exported a large amount of *Sytosanthes guianensis* in international trade. Moreover, milled and tableted *Leucaena leucocephala* have been used for swine and poultry feeding so it should be add in subgroup 050C, Processed products of legume feeds.

Brazilian stylo, brazilian lucerne, common stylo,

Stylosanthes guianensis

Rational: Brazilian stylo (hay) has been used for cattle feeding and also was processed by milled and cubed for cattle feed product. It should be added in subgroup 050C, Processed products of legume feeds (such as silage, meal, hulls).

- The scientific name should be specified genus and species that are *Centrosema* spp., *Arachis glabrata* and *Panicum* spp.

Subgroup 050B, Products of legume feeds with low water content (hay)

- AL3367 Centurion, hay

Centrosema spp. ~~pascuorum~~ Murt. Ex Benth.,

- AL 3375 Perennial peanut, hay

Arachis glabrata Benth. var. *glabrata*; Pinto peanut, *Arachis pintoi* Krapov. & W.C.

Greg

Subgroup 051A, Cereal grains and grasses (including pseudocereals) feed products with high water content (forage)

- AF 3495 Millet, forage

Millet, barnyard, *Echinochloa frumentacea* Link; Millet, finger, *Eleusine coracana* (L.)

Gaertn.; Millet, foxtail, *Setaria italica* (L.) P. Beauv. subsp. *italica*; Millet, little, **Panicum** spp.

~~sumatrense~~ Roth; Millet, proso, **Panicum** spp. ~~miliaceum~~ L. subsp. ~~miliaceum~~; Millet, pearl,

Pennisetum glaucum (L.) R. Br.;

subgroup 051B, Cereal grains and grasses (including pseudocereals) feed products with low water content (hay, straw)

- AS 0646 Millet, hay

Millet, barnyard, *Echinochloa frumentacea* Link; Millet, finger, *Eleusine coracana* (L.)

Gaertn.; Millet, foxtail, *Setaria italica* (L.) P. Beauv. subsp. *italica*; Millet, little, **Panicum** spp.

~~sumatrense~~ Roth; Millet, proso, **Panicum** spp. ~~miliaceum~~ L. subsp. ~~miliaceum~~; Millet, pearl,

Pennisetum glaucum (L.) R. Br.;

- AS 2505 Millet, straw

Millet, barnyard, *Echinochloa frumentacea* Link; Millet, finger, *Eleusine coracana* (L.)

Gaertn.; Millet, foxtail, *Setaria italica* (L.) P. Beauv. subsp. *italica*; Millet, little, **Panicum** spp.

~~sumatrense~~ Roth; Millet, proso, **Panicum** spp. ~~miliaceum~~ L. subsp. ~~miliaceum~~; Millet, pearl,

Pennisetum glaucum (L.) R. Br.;

Rational: Specifying of cultivar name according to the draft revision of the classification of food and feed will not cover other cultivars used as feed product.

- We would like to propose the editorial change of pangula to be pangola in CX/PR 19/51/6 AS3507 **pangola**, ~~Pangula~~, hay
- In case of the creation of subgroup 051 D: Grasses, we are of the opinion that grasses should be still retained in cereal grains group as 051 Cereal grains and grasses (including pseudocereals) feed products. And, it could be classified subgroup with the basis of water content and processing.