



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

53rd Session
(Virtual)

July 4-13 2022

PROPOSAL FOR A MODIFICATION OF THE PORTION OF THE COMMODITY TO WHICH MAXIMUM RESIDUE LIMITS APPLY AND WHICH IS ANALYZED FOR FRUITS WITH INEDIBLE PEEL

(Prepared by Ecuador)

GENERAL INFORMATION

1. This paper builds on the information and analysis provided in CX/PR 22/53/19 and offers a further analysis of the provisions currently available in the *Guidelines on the portion of commodities to which MRLs apply and which is analyzed* (CXG 41-1993) in particular for Group 014 – Assorted fruits, inedible peel and the corresponding provisions in the revised *Classification of Food and Feed* (CXA 4-1989) in particular Class A - Primary Food Commodities of Plant Origin, Type 01 Fruit Commodity Groups, Group 006 – Assorted tropical and sub-tropical fruits, inedible peel which now comprises the same commodities such as avocado, mangoes, guavas, papaya, pineapple, etc. as per Group 014 of Guideline CXG41 for which a revision is requested in relation to the portion of the commodity to which the MRL applies and it is analyzed.
2. This CRD should be read in conjunction with CX/PR 22/53/19 while focusing on the recommendation provided in this CRD in paragraph 12.

Guidelines on the Portion of Commodities to which MRLs apply and which is analyzed (CXG 41-1993)

3. These Guidelines had been last updated at CCPR42 (2010). The Committee considered whether the Guidelines should be kept as a stand-alone document or should be integrated in other more relevant documents that also contain information on the edible portion of the commodity to which the pesticide residue applies. The Committee agreed that, for the time being, the Guidelines should be retained as a single document and that this question be revisited upon completion of the revision of the Classification of Food and Feed.¹
4. According to the Guidelines, Codex MRLs (CXLs) are in most cases stated as in terms of a specific whole raw agricultural commodity as it moves in international trade. In some instances, a qualification is included that describes the part of the raw agricultural commodity to which the MRL applies, for example, almonds on a shell-free basis and beans without pods.
5. In other instances, such qualifications are not provided. Therefore, unless otherwise specified, the portion of the raw agricultural commodity to which the MRL applies, and which is to be prepared as the analytical sample for the determination of pesticide residues is as described for the 33 groups listed in the Guidelines.
6. From these 33 groups, Group 14 is the Assorted Fruits – Inedible Peel: avocados, bananas, guavas, kiwi fruit, mangoes, papayas, passion fruit, and pineapples. The portion of commodity to which the Codex MRL applies (and which is analyzed) is:
 - **Whole commodity unless qualified.**
 - Pineapples: after removal of crown.
 - Avocado and mangoes: whole commodity after removal of stone but calculated on whole fruit.
 - Bananas: after removal of crown tissues and stalks

¹ ALINORM 10/33/24, para. 190

Classification of Food and Feed (CXA 4-1989)

7. The Classification is intended primarily to ensure the use of uniform nomenclature and secondarily to classify foods into groups and/or sub-groups for the purpose of establishing group MRLs for commodities with similar characteristics and residue potential. In addition to providing the code number, name and description of the commodities under the different Classes, Types, Groups and Subgroups. The Classification also contains provisions on the portion of the commodity to which the MRLs apply and which is analyzed.
8. CCPR36 (2004) started discussion on the revision of the Classification which continues so far under Agenda Items 7b/c. Between 2004 and 2021, the revision of several Classes has been finalized, including the revision of Class A Primary Food Commodities of Plant Origin, which includes Type 01 Fruit Commodity Groups and within this Type Group 006 Assorted tropical and sub-tropical fruits (inedible peel) which includes a number of key commodities moving in international trade such as avocado, bananas, guavas, mangoes, papaya, pineapple, etc. The revision of Type 01 was completed by CCPR44 (2012) and adopted by CAC35 (2012)².
9. The Classification indicates that, for Group 006 Assorted tropical and subtropical fruits - inedible skin, the portion of the commodity to which the MRL applies (and which is analyzed): **Whole fruit unless qualified: e.g., banana pulp. Pineapple after removal of crown. Avocado, mangos and similar fruit with hard seeds: Whole commodity after removal of stone but residue calculated and expressed on whole fruit.**

CONCLUSIONS

10. Due to the above, it is necessary that the *Guidelines on Portion of Commodities to which MRLs apply and which is analyzed* (CXG 41-1993) and the *Classification of Food and Feed (CXA 4-1989)* maintain a harmony in the **qualification** of the product, since this would guide more clearly when carrying out the analysis of pesticide residues of the raw agricultural commodity to which the MRL applies and which must be prepared as an Analytical Sample for the determination of residues of pesticides, safeguarding the health of the consumer and avoiding negative repercussions on trade.
11. By not considering the analysis of these fruits, without a product qualification, the MRLs established for them could be exceeded, leading to the conclusion that the food is not suitable for consumption, giving rise to obstacles and/or unfair practices in international trade. and the generation of waste.

RECOMENDATIONS

12. CCPR is invited to:
 - a. note that it is important to clarify and surely qualify the commodities listed in Group 14 (CXG 41-1993) and those listed in Group 006 of the revised *Classification of Food and Feed (CXA 4-1989)* for consistency as per whether they are the same commodities as well as the description of the portion of the commodities to which the MRL applies and it is analyzed;
 - b. consider the opportunity to discuss the issues raised on the portion of the commodity to which the MRL applies and it is analyzed for fruits with inedible peel (Agenda Item 17, CX/PR 22/53/19 and CRD05) in the framework of the revision of the *Classification of Food and Feed* (Agenda Item 7); and
 - c. consider the appropriateness of tasking the EWG on the revision of the Classification to consider the portion of the commodity to which the MRL applies and it is analyzed for Group 014 (CXG41) and Group 006 (CXA 4) and to report back on their findings at CCPR54 (2023).

² REP12/PR44, para. 107, Appendix VIII; REP12/CAC35, Appendix III