



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

**50<sup>th</sup> Session  
Haikou, P.R. China, 9-14 April 2018**

### Comments on Agenda Item 7(a), 7(c), submitted by Japan

#### **Agenda Item 7a Revision of the Classification of Food and Feed : Type 04 Nuts, Seeds and Saps (Group 022 – Tree nuts, Group 023 – Oilseeds, Group 024 – Seed for beverages and sweets and Group 025 - Tree saps (at Steps 4 and 7))**

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the draft and proposed revision of the Codex Classification for Type 04 Nuts, Seeds and Saps (CX/PR 18/50/6). Japan would like to provide the following comments:

Japan supports the advancement of the revised Type 04 Nuts, Seeds and Saps as presented in Appendices I – IV to Step 8 if the following amendments are included.

#### **Comments on the clarification of *Portion of the commodity to which the MRL applies (and which is analyzed)* for Group 022 Tree nuts**

The current *Portion of the commodity to which the MRL applies (and which is analyzed)* for Group 022 Tree nuts is defined as “Whole commodity after removal of shell. Chestnut: Whole in skin.” For Japanese chestnut, nutmeat (edible portion) is usually tightly covered by pellicle, difficult to peel without a knife or a peeling machine, which is inside the shell as shown in the following figure. There may be some confusion over the term “Whole in skin” of chestnut especially for non-native English speakers as the term “skin” is used to refer to either inner skin (pellicle) in some cases or outer skin (shell) in other cases.

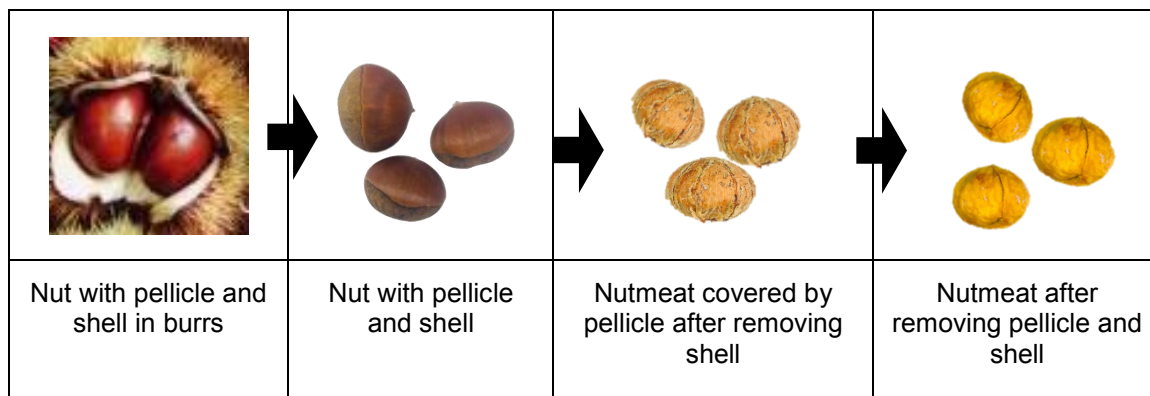


Fig. Structure of chestnut (Japanese)

For chestnut, if the term “whole in skin” in the current definition intends to refer to the nutmeat with the pellicle, this specific term may not be necessary. In order to avoid any possible confusion in the application of MRLs, the *Portion of the commodity to which the MRL applies (and which is analyzed)* for Group 022 should be amended as follows:

“Whole commodity after removal of shell. ~~Chestnut: whole in skin.~~”

#### **Comments on Group 023 Oilseeds**

As the morphology and size of “fruit” commodities proposed for inclusion in Subgroup 023E Oilfruits are significantly different from those of “seed” commodities in other subgroups, Codex MRL for Group 023 except subgroup 023 should be established in the absence of the residue data on representative commodities for Subgroup 023E. For this reason, Japan would like to propose the inclusion of the following entry after SB 0089 Group of Oilseeds, except peanut:

## SO XXXX Group of Oilseeds, except oilfruits

### Agenda Item 7c Revision of the Classification of Food and Feed: Impact of Revised Commodity Groups and Subgroups in Type 03 Grasses, Type 04 Nuts, Seeds and Saps and Type 05 Herbs and Spices on Codex MRLs

Japan appreciates the efforts of the United States of America and the Netherlands in leading the electronic working group (eWG) for preparing the paper on impact of revised commodity groups and subgroups in Type 03, 04 and 05 on Codex MRLs (CX/PR 18/50/8). Japan would like to provide the following comments:

#### Comments on consequential amendments proposed in point 3 of Appendix I

In relation to the consequential amendments on Codex MRLs arising from the transfer of Sweet corn (corn-on-the-cob) and Sweet corn (whole kernel) from Group 012 Fruiting vegetables, other than Cucurbits to Group 020 Cereal Grains, Japan supports the proposal by the Chair of eWG as stated in point 3 of Appendix I as follows:

- Add the note “excluding Sweet corn” to code ‘GC 0080 Group of Cereal grains’ and to code ‘GC 0081 Subgroup of Cereal grains except pseudocereals’; and
- At the same time add the groups Codex MRLs of the vegetable group and the subgroup fruiting vegetables other than cucurbits to both Sweet corns.

As the most of existing Codex MRLs for ‘VO 0050 Fruiting vegetables, other than cucurbits’ excludes sweet corn, it would be helpful for Members and Observers if CCPR clarifies whether specific group MRLs apply to sweet corn.

According to the relevant CCPR Reports and JMPR Evaluations, Codex MRLs for ‘VO 0050 Fruiting vegetables, other than cucurbits’ can be classified into the following 3 cases:

- i. For 2 pesticides, the Codex MRLs are established for VO 0050 including sweet corns (see the following Table 1);
- ii. For 4 pesticides, the Codex MRLs are established for VO 0050 for which there are discrepancies in the decision on inclusion or exclusion of sweet corns between the JMPR and the CCPR (see the following Table 2); and
- iii. For the remaining 27 pesticides, the Codex MRLs are established for VO 0050 excluding sweet corns (see the following Table 3).

Japan considers it necessary for the Committee to take action as shown in the column, “Proposed action by CCPR50” in the following Tables 1 - 3.

The Committee has previously agreed that “no changes would be made to existing CXLs until such time as JMPR reviews were completed as per current procedures for the establishment of Codex schedules and priority list of pesticides. The Committee agreed that the same approach would be taken when reviewing other commodity groups in the database following the adoption of revised commodity groups in the Classification” (REP13/PR, para. 109; REP16/PR, para. 119). Nonetheless, for the Codex MRLs listed in Table 2, given that there seems to have been no clear reason for discrepancies in the decision on inclusion or exclusion of sweet corns between the JMPR and the CCPR, the Committee may take this opportunity to decide whether or not to reconsider the decision on inclusion or exclusion of sweet corns from Codex MRLs for ‘VO 0050 Fruiting vegetables, other than cucurbits.’

Table 1. Existing Codex MRLs for ‘VO 0050 Fruiting vegetables, other than cucurbits’ including sweet corns.

Pesticide	Codex MRL (mg/kg)	JMPR Evaluation		CCPR Report		Proposed action by CCPR50
		year	Note	year	Note	
Cyhalothrin (includes lambda-cyhalothrin)	0.3	2008	except fungi	2009	Except mushrooms	Add the Codex MRL for VO 0050 Fruiting vegetables, other than cucurbits to GC 1275 Sweet Corn (whole kernel without cob or husk) and GC 0447 Sweet corn (Corn-on-the-cob) (kernels plus cob with husk removed)
Paraquat	0.05	2004	(No note)	2006	(No note)	

Cyromazine	1	2007	except sweet corn (on-the-cob) and mushrooms	2008	Except mushrooms and sweet corn-on-the-cob	Add the Codex MRL for VO 0050 to GC 1275 Sweet Corn (whole kernel without cob or husk)
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Table 2. Existing Codex MRLs for 'VO 0050 Fruiting vegetables, other than cucurbits' for which there are discrepancies in the decision on inclusion or exclusion of sweet corns between the JMPR and the CCPR.

Pesticide	Codex MRL (mg/kg)	JMPR Evaluation		CCPR Report		Proposed action by CCPR50
		year	Note	year	Note	
Dimethomorph	1.5	2014	except mushrooms and sweet corn	2015	(No note)	Decide whether or not to add the Codex MRL for VO 0050 Fruiting vegetables, other than cucurbits to GC 1275 Sweet Corn (whole kernel without cob or husk) and GC 0447 Sweet corn (Corn-on-the-cob) (kernels plus cob with husk removed)
Thiamethoxam	0.7	2010	except sweet corn	2011	(No note)	
Novaluron	0.7	2010	(No note)	2011	Except sweet corn.	
Pirimicarb	0.5	2006	excludes edible fungi and sweetcorn (both kernels and corn-on-the-cob)	2007	Excludes edible fungi and Sweet corn-on-the-cob	Decide whether or not to add the Codex MRL for VO 0050 to GC 1275 Sweet Corn (whole kernel without cob or husk)

Table 3. Existing Codex MRLs for 'VO 0050 Fruiting vegetables, other than cucurbits' excluding sweet corns.

Pesticide	Codex MRL (mg/kg)	JMPR Evaluation		CCPR Report		Proposed action by CCPR50
		year	Note	year	Note	
Acetamiprid	0.2	2011	except sweet corn and mushrooms	2012	except sweet corn & mushrooms	No action needed.
Ametoctradin	1.5	2012	except sweet corn and mushrooms	2013	except sweet corn and mushroom	
Azoxystrobin	3	2008	except fungi and sweet corn	2009	Except Mushrooms and Sweet corn	
Boscalid	3	2009	except fungi, mushrooms and sweet corn	2010	Except fungi, mushroom and sweet corn.	
Chlorantraniliprole	0.6	2008	except mushrooms and sweet corn	2009	Except Mushrooms and Sweet corn	
Clothianidin	0.05	2010	except sweet corn and mushrooms	2011	Except sweet corn	
Cyantraniliprole	0.5	2013	excluding sweet corn and mushrooms	2014	except mushrooms & sweet corn	
Cyprodinil	2	2013	except mushroom and sweet corn	2014	except sweet corn and mushroom	
Dichlobenil	0.01(*)	2014	except sweetcorn and mushrooms	2015	Except sweetcorn and mushrooms	
Difenoconazole	0.6	2013	except sweet corn and mushrooms	2014	except sweet corn and mushroom	
Dinotefuran	0.5	2012	except sweet corn and mushrooms	2013	except sweet corn and mushrooms	

Diquat	0.01(*)	2012	except sweetcorn, fungi and mushrooms	2014	except sweetcorn, fungi and mushrooms
Emamectin benzoate	0.02	2011	except sweet corn and mushrooms	2012	except sweet corn and mushrooms
Fenamidone	1.5	2014	except sweet corn, fungi and chilli pepper	2015	Except chilli pepper, fungi, sweet corn
Fenpyroximate	0.2	2010	except sweet corn and mushroom	2011	Except sweet corn and mushrooms
Fonicamid	0.4	2015	excluding mushrooms and sweet corn	2016	except mushrooms and sweet corn
Fluensulfone	0.3	2014	except sweet corn and mushroom	2015	except sweet corn and mushroom
Flumioxazin	0.02(*)	2015	except sweetcorn and mushrooms	2016	except sweet corn and mushrooms
Fluopicolide	1	2009	except mushrooms and sweet corn	2010	Except mushrooms and sweet corn.
Fluxapyroxad	0.6	2012	except mushrooms and sweet corn	2013	except sweet corn and mushrooms
Penthiopyrad	2	2012	except sweet corn and mushroom	2013	except sweet corn and mushroom
Spirotetramat	1	2008	except Chilli peppers, except mushrooms, except sweet corn.	2009	Except sweet corn, mushrooms and chili pepper
Sulfoxaflor	1.5	2011	except sweet corn and mushrooms	2013	except sweet corn and mushrooms
Triadimefon	1	2012	except fungi and except sweet corn.	2009	Except fungi and sweet corn. Based on triadimefon and triadimenol uses.
Triadimenol	1	2012	except fungi and except sweet corn.	2009	Except fungi and sweet corn. Based on Triadimefon uses only