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ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 16th SESSION OF THE CODEX COMMITTEE ON PESTICIDE RESIDUES

26 JUNE - 1 JULY 2023, Beijing, P.R. China

AGENDA ITEM 7: REVISION OF THE CLASSIFICATION OF FOOD AND FEED (CXA 4-1989)

Objective

This document offers a review and analysis of the agenda items planned for discussion at the 16th session of the **Codex Committee on Pesticide residues (CCPR54)**, scheduled to take place in Beijing, P.R. China from 26th June to 1st July 2023. This document is intended for possible use by the Codex communities of practice, promoted by [GForSS](#) and [PARERA](#), as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above ([PARERA](#) and [GForSS](#)), their membership or their management. It provides a synthesis and analysis of the work currently under discussion by the CCCF, which may be useful for delegations from Arab countries to prepare their positions considering the needs and specificity of the region and the potential impact of the proposed food standards. This analysis is prepared as part of the [Codex Initiative for the Arab Region: Arab Codex Initiative](#), implemented by [PARERA](#) and [GForSS](#), hosted and coordinated by the [Arab Industrial Development, Standardization and Mining Organization \(AIDSMO\)](#) and funded by the US Codex Office, US Department of Agriculture.

**It is important to note that experts – members of the Arab Expert Working Group – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the Arab Expert Working Group proceedings is based on each expert's own credentials and experience, which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

Agenda Item 7 (a) : Class B – Primary Food Commodities of Animal Origin and Class E - Processed Foods of Animal Origin (All Types) (at Step 4)

Document CX/PR 23/54/6

Background

- ❖ CCPR53 considered the recommendations prepared by the Chairs of the VWG (CRD07) and expressed agreement with the structure outlined and that consideration of additional commodities and representative commodities would be taken up by the EWG including proposals submitted in writing to this Session as available in CRDs.
- ❖ CCPR53 (2022) agreed to return Class B and Class E to Step 2/3 for further development by the EWG
- ❖ CCPR53 (2022) agreed to re-establish the EWG on the revision of the Classification, chaired by USA and cochaired by The Netherlands to continue consideration of Class B, Primary Food Commodities of Animal Origin and Class E, Processed Foods of Animal Origin.

Analysis

Additional groups, subgroups and commodities were proposed for inclusion in Class B and E.

- Consideration of Class B

The current Class B includes **5 types, 16 groups, 2 reserved groups and no subgroups**. Based on discussions and comments from the EWG, the revised Class B includes **6 types, 18 groups, no reserved groups and 65 subgroups**. The **additional groups include groups for Amphibians and Reptiles** (replaces reserved Group 046) and Invertebrate animals group (replaces reserved Group 047). Numerous commodities have also been added to the respective groups/subgroups. A new type 'MISCELLANEOUS PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN' was added (proposed Type 10a) for the inclusion of honey and other bee product. To add the new groups, the existing numbering had to be adjusted and new group numbers were added in types 8, 9 and 10. For the new subgroups in Class B, the codes from 3700 have been used. As far as possible, for the new products a number in the same range as the existing products in a group has been used. The revised Class B can be found in Appendix I (CX/PR 23/54/6).

Consideration of Class E

The current Class E includes **4 Types, 8 groups (and 1 reserved groups) and no subgroups**. Based on discussions and comments from the EWG, the revised Class E includes **10 groups with Group 081** Dried muscle and other avian products replacing Reserved Group 081. Group 083 Secondary invertebrate food commodities of animal origin has also been added. Additional subgroups (13) have been added along with numerous commodities. The proposed revised Class E can be found in Appendix II (CX/PR 23/54/6).

Comments and Discussions

For Class B:

- ❖ China suggests including the addition of a number of freshwater fish, marine fish, crustaceans, amphibians, reptiles, mollusc, and other invertebrates.
- ❖ Australia proposed the use for the harmonized definition (JECFA/CCRVDf) for edible offal for meat, muscle, and fat and to change the term "meat" to "muscle".
- ❖ Thailand proposed changing "poultry" to "avian" given the addition of avian species. Thailand also proposed the addition of a number of invertebrate commodities. No reaction was received to Japan's proposal to adjust the introductory text for Group 044, so no adjustment has been made

For Class E:

- ❖ Germany and Iran regarding avian products and Thailand proposed a number of additional fish and insect commodities.
- ❖ China proposed a number of dried fish products

Conclusion and recommendations

Arab delegations may support to advance the revised Class B and E to Step 5 or 5/8 for adoption as a draft or final text by CAC46

Agenda Item 7 (b) : Tables on examples of representative commodities for commodity groups in different types under Class B and Class E (at Step 4)

Document : CL 2023/34-PR

CCPR 54 invited to consider the proposals for examples of representative commodities for the revised Class B (Appendix I) and Class E (Appendix II).

Background

The practice adopted by CCPR in the revision of the Classification is to retain the revision of the commodity groups (e.g. fruit commodity groups, vegetable commodity groups, etc.) waiting for the final compilation of the related commodity groups and the corresponding tables on examples of representative commodities for inclusion in the Classification of Food and Feed and the Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of Maximum Residue Limits for Pesticides to Commodity Groups (CXG 84-2012) respectively.

CCPR52 (2021) agreed to re-establish the EWG on the revision of the Classification, chaired by the USA and cochaired by The Netherlands, working in English, and to initiate consideration of Class B, Primary Food Commodities of Animal Origin and Class E, Processed Foods of Animal Origin.

CCPR53(2022) considered the recommendations prepared by the Chairs of the VWG (CRD07) and expressed agreement that consideration of additional commodities and representative commodities would be taken up by the EWG. CCPR53 agreed to re-establish the EWG on the revision of the Classification, chaired by USA and co-chaired by the Netherlands, working in English only, to continue working on Classes B and E of the Classification and prepare tables of representative commodities;

Analysis

- ❖ Appendix I includes proposed examples for the selection of representative commodities for groups and subgroups for Class B, Types 6-10a.
 - Type 6 Mammalian products ;
 - Type 7 Avian products ;
 - Type 8 Aquatic animal product,
 - Type 9 Amphibians and reptiles;
 - Type 10 Invertebrate animals: Type 10a Miscellaneous primary food commodities of animal origin.
- ❖ Appendix II includes proposed examples for the selection of representative commodities for Class E, Types 16- 19



- Type 16 Secondary food commodities of animal origin;
 - Type 17 Derived edible products of animal origin;
 - Type 18 Manufactured Food (single ingredient) of animal origin;
 - Type 19 Manufactured food (multi-ingredient) of animal origin.
- ❖ EWG consider that it's not possible to establish representative commodities for all groups / subgroups, because of the diversity of commodities in some of the groups/subgroups.

Groups / Subgroups for which it's not possible to establish representative commodities

Class B - Primary food commodities of animal origin

- Group 032 Edible offal (mammalian) : Subgroup 032A Bovine edible offal; subgroup 032B Camelid edible offal; Subgroup 032C Caprine edible offal; Subgroup 032D Cervine edible offal; Subgroup 032E Equine edible offal; subgroup 032F Ovine edible offal; Subgroup 032G Swine edible offal; Subgroup 032H Various other mammalian edible offal
- Group 038 Avian, Edible offal
- Group 040 Freshwater fish : Subgroup 040F Various other freshwater fishes;
- Group 041 Diadromous fish : Subgroup 041F Various other diadromous fishes
- Group 042 Marine fish : Subgroup 042G Various other Marine fishes
- Group 043 Fish roe (including milt= soft roe) and edible offal of fish : Subgroup 043B Edible offal of fish
- Group 044 Marine mammalian products
- Group 046 Amphibians and reptiles : Subgroup 046A Crocodiles; Subgroup 046B Frogs; Subgroup 046C Lizards; Subgroup 046D Snakes; Subgroup 046E Turtles Group 047 Molluscs and various other invertebrate animals: Subgroup 047C Sea and freshwater snails; subgroup 047D Snails and slugs; Subgroup 047E Various other invertebrate animals
- Group 048 Insects and spiders : Subgroup 048B Insects (Insecta); subgroup 048A Spiders (Arachnida)

Class E - Processed foods of animal origin

- Group 080 Dried muscle and dried fish products and dried echinoderms
 - Group 081 Dried muscle and other avian products
 - Group 082 Secondary food commodities of animal origin
 - Group 083 Secondary invertebrate food commodities of animal origin : Subgroup 083C Insects, dried; Subgroup 083D Crustaceans, dried ; Subgroup 083E Sea and freshwater snails, dried; Subgroup 083F Amphibians and reptiles, dried
 - Group 085 Animal fats, processed
 - Group 087 :Derived edible products of animal origin
 - Group 090 : Manufactured Food (single ingredient) of animal origin
 - Group 092 Manufactured food (multi-ingredient) of animal origin
 - Alternative representative commodities may be selected based on documented regional/country differences in dietary consumption and/or areas of production.
- ❖ EWG noted that when a group contains a number of processed commodities originating from raw commodities from one subgroup in Class B (primary food commodities of animal origin), the representative commodity from

that subgroup in Class B can be used as a representative crop for the corresponding commodities in processed form

Conclusion and recommendations

- Arab delegations may propose additional efforts regarding the Table featuring examples of representative commodities for class E and B, as outlined in Appendix I and II. These efforts would primarily focus on products that are of particular relevance to the Arab region, such as the edible offal group, processed animal fats, and the Marine fish group. Specifically, the Arab delegations may suggest the inclusion of the most commonly traded fish in the Arab region, namely Seabass.

Agenda Item 7 (c) : Portion of the commodity to which the MRLs apply, and which is analyzed for Group 006 Assorted Tropical and Sub-tropical fruits - Inedible Peel and Group 023 Oilseeds

Background

- ❖ The CCPR42 (2010) further considered Group 023 and decided to retain the revised version at Step 7 until revision of the Classification was complete. At that stage, the relevant wording for Oilseeds was 'after removal of shell or husk'.
- ❖ Group 023 was not discussed at CCPR43-CCPR48.
- ❖ The CCPR49 (2017) noted that the revised Oilseeds group had been finalized and retained at Step 7. Therefore, any changes to the revised Group should only involve compilation and review to ensure consistency in terminology and code systems, location in relevant tables for representative commodities and the inclusion of additional commodities.
- ❖ The agenda paper for CCPR50 (2018) presented all the proposed revised commodity groups under Type 04 Nuts, seeds, and saps, for the Committee's consideration. The Portion of the commodity to which the MRL applies (and which is analysed) was shown as 'Unless otherwise specified, seed or kernels, 'with shell or husk'.
- ❖ The Committee made no changes to the revision of Group 023 and agreed to advance the revised version to Step 8. The CAC41 adopted the revised version of Group 023 without change.
- ❖ The Classification of Foods and Animal Feeds, Group 023 Oilseeds, adopted by the CAC41 specifies The Portion of the commodity to which the MRL applies (and which is analysed) to be 'Unless otherwise specified, seed or kernels, with shell or husk'. Australia considers the specification 'with shell or husk' is not what CCPR intended when the revision of Group 023 was adopted.
- ❖ There appears to be no record of discussion or agreement at CCPR between 2010 and 2018 to explain or justify the change from 'after removal of shell or husk' to 'with shell or husk'.
- ❖ CCPR53 (2022) considered other matters related to the revision of the Classification of Food and Feed concerning the modification of the portion of commodities to which MRLs apply and which is analyzed in relation to:
 - Group 014 (Assorted fruits – inedible peel) (Guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993)) and Group 006 (Assorted tropical and sub-tropical fruits – inedible peel (Classification of Food and Feed (CXA 4-1989))).
 - Group 023 Oilseeds
- ❖ CCPR53 (2022) agreed to re-establish the EWG on the revision of the Classification, chaired by USA and co-chaired by The Netherlands to continue work on the revision of the Classification and in addition, to consider the proposals on the portion of the commodity to which MRLs apply, and which is analyzed for Group 006 Assorted tropical and sub-tropical fruits - inedible peel and Group 023 Oilseeds.

Analysis

- ❖ Assorted fruits with inedible peel are mostly produced in tropical or sub-tropical regions. Analyzing the production areas of banana, avocado, kiwi fruit, mangoes, guavas, papayas and pineapples, the regions of Asia, Africa, Latin America, and the Caribbean share most of the production area. Table 1 shows the trade data of Assorted fruits with inedible peel in Arab

Table 1: Trade data of Assorted fruits with inedible peel in Arab Region (2022).

		Mango	Pineapple	Avocado	Papaya	Banana
Exports (tonnes)	2022	Egypt: 63988 Soudan: 683		Lebanon : 7 277		
				Morocco : 63 016		
Import (tonnes)	2022	Kuwait : 9 582 Saudi Arabia : 89 472	Saudi Arabia : 17 834	United Arab Emirates : 20 994	Saudi Arabia : 161	Algeria : 60 Tunisia : 35
		United Arab Emirates : 84 663	United Arab Emirates : 23 528 Egypt Morocco : 8 928	Morocco : 6 859	United Arab Emirates : 18 897	

- ❖ The inclusion of shell or husk is impractical and problematical for peanuts and other oilseeds. The inclusion of shell and husk in the portion of the commodity **to which the MRL applies is out of step** with the previous Codex Classification and other international guidance on the portion of the commodity which should be sampled for analysis in residue trials conducted to support MRL development,
- ❖ CCPR is invited to consider the changes to Classification of Food and Animal Feed (CXA 4-1989) for Group 006 – Assorted tropical and sub-tropical fruits (inedible peel) and Group 023 - Oilseeds and oilfruits. Consensus was reached that the changes to the Classification of Food and Feed should be implemented:

Group 006 Assorted tropical and sub-tropical fruits - inedible peel

Portion of the commodity to which the MRL applies (and which is analysed): Whole fruit unless qualified: e.g.

- Banana after removal of crown tissue and stalks.
- 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.

Group 023 Oilseeds and oilfruits

Portion of the commodity to which the MRL applies (and which is analyzed):

- Oilseeds: Unless otherwise specified, seed or kernels, with shell or husk.
- Peanuts: Kernels - Castor beans: Whole product after removal of capsules
- Cotton seeds: Undelinted - Oilfruits: Whole commodity

Comments and discussions

For Group 006 Assorted tropical and sub-tropical fruits – inedible peel;

- ❖ Ecuador proposed in the working document submitted to CCPR53 (CX 22/53/19) that the portion of commodities to which CXL apply and is analyzed should be the **whole product without the peel** for Group 006 Assorted Tropical and Sub-tropical fruits – inedible peel (avocado, passion fruit, banana, pineapple, kiwi, mango, papaya).
- ❖ AgroCare Latinoamérica and Thailand supported the proposal by Ecuador.
- ❖ Australia did not support the proposed change because the change would not reflect the commodities in trade and could necessitate reconsideration of current CXLs.
- ❖ Australia and Germany noted the need to revise the misleading wording for “banana pulp”.
- ❖ India, France, the European Union (EU) and Crop Life International supported Australis’s position that the whole fruit is the portion to which the MRL applies and is analyzed.

For Group 023 Oilseeds

- ❖ Australia proposed in that the EWG reconsider the portion of the commodity to which the MRL applies as there appears to be no record of discussion or agreement at CCPR to justify the change from “after removal of shell or husk” to “with shell or husk”. Australia indicated that oilseeds should be considered as “Unless otherwise specified, seed or kernels after removal of shell or husk”. [note that most small oilseeds are processed either mechanically or chemically to obtain the oil].
- ❖ Germany cited EU regulations which excepts peanuts/groundnuts, cotton seed, castor bean.
- ❖ Thailand supported considering oilseed commodities that need removal of its shell or husk.

Conclusion and recommendations

Arab codex delegations may support the revision of the Classification as per the changes proposed for Group 006 – Assorted tropical and subtropical fruits (inedible peel) and Group 023 – Oilseeds and oilfruits.

Agenda Item 7 (d) : Review the Guidelines on Portion of Commodities to which MRLs apply and which is analyzed (CXG 41-1993) with a comparison to the Classification of Food and Feed (CXA 4-1989)

Reference Documents CX/PR 23/54/8 and CX/PR 23/54/9

CCPR is invited to consider changes to Classification of Food and Animal Feed (CXA 4-1989) for Group 006 – Assorted tropical and sub-tropical fruits (inedible peel) and Group 023 - Oilseeds and oilfruits

Background

- ❖ CCPR53 (2022) considered matters related to the revision of the Classification of Food and Feed concerning the modification of the portion of commodities to which MRLs apply and which is analyzed in relation to:
 - Group 014 (Assorted fruits – inedible peel) (Guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993)) and Group 006 (Assorted tropical and sub-tropical fruits – inedible peel (Classification of Food and Feed (CXA 4-1989))
 - Group 023 Oilseeds
- ❖ CCPR53 (2022) agreed to re-establish the EWG on the revision of the Classification, chaired by USA and co-chaired by The Netherlands to continue work on the revision of the Classification and in addition, to consider the proposals on the portion of the commodity to which MRLs apply, and which is analyzed for Group 006 Assorted tropical and sub-tropical fruits - inedible peel and Group 023 Oilseeds

Analysis



Consensus was reached that Classification of Food and Animal Feed (CXA 4-1989) should take precedence over Guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993) and that the changes to the Classification concerning Group 006 – Assorted tropical and sub-tropical fruits (inedible peel) and Group 023 Oilseeds and oilfruits should be implemented.

Comments and discussions

- ❖ Germany noted that commodities with small seeds are not addressed in group 005, Assorted tropical and sub-tropical fruits – edible peel. Germany also noted that bananas are better solved in CXG 41, while the rest is better solved in CXA 4. This position regarding bananas was also supported by Costa Rica, France, and Thailand.
- ❖ Germany, Saudi Arabia, Ecuador, Australia, France, and India all supported that the revised classification should be the basis for the portion of the commodity to which the MRL applies (and which is analysed).

Conclusion and recommendations

Arab codex delegations may support the recommendation to revoke the Guidelines on portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993) as the Classification of Food and Animal Feed (CXA 4-1989) now takes precedence over CXG 41-1993. Doing so will avoid having two Guidelines addressing the same or similar text where there may be overlapping or conflicting information.