EUROPEAN UNION COMMENTS
ON CODEX CIRCULAR LETTER CL 2011/19-PR:


The commodity groups Assorted Tropical and Sub-Tropical Fruits - Edible Peel and Assorted Tropical and Sub-Tropical Fruits - Inedible Peel were adopted by the CAC in July 2011 and advanced to Step 6 for comments and consideration by the 44th Session of the CCPR. Members and Observers were invited to pay special attention to those sections in square brackets.

The following comments are submitted on behalf of the European Union:

A) Proposed Draft Revision of the Codex Classification of Foods and Animal Feeds: “Assorted Tropical and Sub-Tropical Fruits - Edible Peel” and “Assorted Tropical and Sub-Tropical Fruits-Inedible Peel” (At Step 6)

The commodities placed in square bracket in the group Assorted Tropical and Sub-Tropical Fruits - Edible Peel:

- **Jujube, Chinese:** Some delegations proposed to transfer Jujube, Chinese to the group of ‘Stone Fruits’ as it was more similar to that group and grew in temperate climates.

  **EU comment:** The EU is not in favour to transfer Jujube, Chinese to the group of Stone Fruits. In the Codex Classification the description of stone fruits says: “Stone fruits are produced on trees belonging to the genus Prunus of the rose family (Rosaceae).” Chinese Jujube belongs to the Genus Ziziphus of the family Rhamnaceae and does not belong to the genus Prunus. Jujube is in a different plant family (Rhamnaceae instead of Rosaceae) than all the other Stone fruits.

- **Persimmon (Chinese and Japanese):** Some delegations proposed to transfer Persimmon to the pome fruits group in view of their botanical characteristics, climatic growing conditions, trade and pesticide residue pattern, and noted that the inclusion in the group for tropical fruits would result in a decrease in the number of MRLs available.
EU comment: The EU is not in favour to transfer Persimmon (Chinese and Japanese) to the Pome Fruit group. All the commodities of the Pome Fruit group are members of the Rosaceae family. Persimmons are members of the Ebenaceae family or ivory family and are not related to the Rosaceae family. Persimmon fruits are considered botanically to be a type of globular berry and not a pome fruit.

- **Kumquats and Limequats:** Some delegations proposed to transfer Kumquats and Limequats to the Citrus Fruits group as they are classified as Citrus taxonomically and they are traded as such in Asia. Other delegations did not support this amendment as this would result in many MRLs for citrus becoming applicable to kumquat although it has an edible peel, which is not the case of other citrus species.

EU comment: The EU is not in favour to transfer Kumquats and Limequats to the group of Citrus Fruit, because of the different use (consumed with peel) and the small size of the fruits. These commodities should be kept them in the group of Assorted Tropical and Subtropical Fruits – edible peel.

- **Tamarind:** It was proposed to move Tamarind from the group of Assorted Tropical and sub-tropical fruits - edible peel medium to large to the group of Assorted Tropical and sub-Tropical fruit – inedible peel

EU comment: The EU agrees to move Tamarind from the group of Assorted Tropical and sub-tropical fruits - edible peel medium to large to the group of Assorted Tropical and sub-Tropical fruit – inedible peel- small.

**The commodities placed in square bracket in the group Assorted Tropical and Sub-Tropical Fruits - Inedible Peel:**

- **Madras-thorn**

EU comment: The EU agrees to keep Madras-thorn in the current position in Assorted Tropical and Sub-Tropical fruits – Inedible peel – small.

- **Langsat and Sapodilla**

EU comment: The EU agrees to add synonyms of scientific names to Langsat and Sapodilla

**Commodity group Herbs**

- The new entry for "Edible flowers" was kept in Step 6 for comments and consideration at the next Session. It should be considered to make a separate subgroup of “Edible flowers in the group of Herbs and also the commodities in between brackets in Herbs group in Step 7: Calendula, leaves and [flowers]; in Geranium (lemon, rose); should be considered in relation to the new subgroup of “Edible flowers”
**EU comment:** The EU would like to reiterate its previous comments to make a separate subgroup of "Edible flowers" within the group of Herbs. The "Edible flowers" should be kept as a commodity within the subgroup of Herbs (herbaceous plants).