The European Union (EU) would like to submit the following comments:

**Para 4:** The EU agrees with the proposal to divide group 012 “brassica” into 3 subgroups, since various morphologies were inside the former codex classification. Subgroups will allow a better overview on residue interception and are also in accordance with EU classification (Regulation (EC) 600/2010).

**Para 6:**
The EU welcomes the proposal to move Chinese broccoli and Broccoli raab in the group of leafy brassica greens for reasons of morphology. Both commodities are closer to leafy crops in terms of residue interception and classification.

**Para 7:** The EU agrees with the proposal to move Chinese Cabbage (Pe-tsai type) to the Brassica vegetables group, subgroup Head Brassicas.

**Para 8:**
The proposal to keep Kohlrabi as a separate group is fully supported. In the case of kohlrabi it is noted that not only the tuber-like enlargement of the stem is consumed by humans but also the leaves. Generally higher residues are seen in leaves than in tubers. Therefore, it is proposed to add Kohlrabi leaves to the group 013B Brassica leafy vegetables.

**Para 11:**
The proposal of having a subgroup of leaves of trees, shrubs and vines is supported. In addition the proposal of having a subgroup of aquatic leafy vegetables is fully supported, as to their very specific and unique propagation conditions.

**Para 13:** If a subgroup aquatic leafy vegetable is created, we propose to also transfer watercress from the Brassica leafy vegetables group (013B) to this new subgroup.

**Para 19 and 29:**
While the regrouping of Witloof (chicory sprouts) from the group "stalk and stem vegetables" to the group "leafy vegetables" is supported it should be considered to put witloof into a separate subgroup. The growing practice of the sprouts is completely different from any of the crops mentioned.
Appendix I
Taking into the comment on para. 8 description of the portion of the commodity to which the MRL applies (and which is analysed) should be amended. The definition should read: "Head cabbages and Kohlrabi: Whole commodity as marketed, after removal of obviously decomposed or withered leaves. Cauliflower and broccoli: flower heads (immature inflorescence only). Brussels sprouts: “buttons” only. Kohlrabi: "tuber-like enlargement of the stem" only.

Appendix II
Group 013A Leafy greens subgroup
VL 0477 Goosefoot
The EU wants to point to the fact that from some varieties of Chenopodium seeds are consumed like quinoa. Quinoa seeds are listed in the groups of Cereal grains in the Codex Classification.

Group 013B Brassica leafy vegetables
VL 0405 Kohlrabi leaves
It is proposed to add Kohlrabi leaves for the reasons given above (human consumption).

Group 013C Leaves of root and tuber vegetables
VL 0469 Witloof chicory (sprouts)
For the reasons given above it is proposed to delete witloof here and put it into a subgroup 013F.

Leafy vegetables:
Agretti (salsola soda Weinm.) should be included in Appendix II in Group 13A.

Appendix III
Group 017C Stalk and stem vegetables - Others
VS 3030 Prickly pear pads
It is proposed to check the code. VS 0356 seems to be more appropriate

Page 6: Chayote leaves are leaves of a fruiting vegetable. Chayote is also a root vegetable VR 0423 and a fruiting vegetable VC 0423. It must be considered if Chayote leaves better fit in a new subgroup of leaves of Cucurbitaceae, together with VL 0421 Balsam pear leaves. The code should be VL 0423 in stead of VL 2792.

In the EU Classification VL 0465 Chervil is classified as fresh herb. It could be considered to move Chervil from the Leafy vegetables to the Herbs group.

In the EU new commodities are proposed to be included in Annex I. It could be considered if the commodities not mentioned in this revised group should be proposed to be included. These commodities are: Water clover (Marsilea crenata L. Presl.) and Bitawiri (Cestrum latifolium Lam.).

Stalk and stem vegetables
In the EU new commodities are proposed to be included in Annex I. It could be considered if the commodities not mentioned in this revised group should be proposed to be included. This is Acacia shoots (Acacia pennata (L.) Willd).