European Union comments on
Codex Circular Letter CL 2012/34-PR

Request for comments at step 6 – Draft Revision to the Codex Classification of Food and Animal Feed – Selected Vegetable Commodity Groups
(REP12/PR, para. 117 and Appendix IX)

The European Union would like to submit the following comments:

**Leafy vegetables (including Brassica leafy vegetables)**

**Vegetables Group 013 Group Letter Code VL**

**EU Proposal**

It is proposed to add a Group 013 H Baby leaves.

**Reason**

There is an increasing general trend in some areas that various commodities are harvested at a significantly earlier stage than “normal” (commonly referred to as “baby leaf” and in a number of cases comprising a mix of various plant species). It may be worthwhile to consider establishing such a sort of “commodity” in the leafy vegetables group, which refers to a growth stage rather than necessarily to one well defined species. It is anticipated for baby leaf products that growth stage is being more important for terminal residues than plant species. A definition to deviate baby leaves from normal leafy vegetables might be to restrict harvest to a certain growth stage.

**Group 013A  Leafy greens**

**EU Proposal**

VL 0460 Amaranth

It is proposed to add leaves.
Reason
The addition seems necessary since amaranth is known in some areas as a cereal like product, i.e. the seed of this plant is also consumed.

**Group 013B Brassica leafy vegetables**

EU Proposal
VL 0494 Radish leaves as well as oil radish greens and rat-tail radish greens.

It is proposed to transfer these commodities to Group 13C “Leaves of root and tuber vegetables”.

Reason
While it is clear that *Raphanus spp.* belong to the *Brassica* family it is more likely that residues will be more comparable to residues from members of Group 13C “Leaves of root and tuber vegetables” since it is expected that the use is more comparable to a use in root and tuber vegetables than in brassica leaf vegetables.

**Group 013E Leafy aquatic vegetables**

EU Proposal
VL 0473 Watercress

Watercress should remain in Group 13 E.

Reason
Cultivation of watercress is in water.

**Group 013F Witloof**

The EU agrees having a separate group for witloof knowing that cultivation of this commodity is completely different from any other leafy crop.

**Group 017A Stalk and stem vegetables - Stems and Petioles**

EU Proposal
VS… Flowering stalk of Garlic

It is proposed to move this commodity in the Group 009 B Spring onions.

Reason
Residues in flowering stalk of garlic will be more likely comparable to spring onions.