European Union comments on
Codex Circular Letter CL 2013/19-PR
REQUEST FOR COMMENTS AT STEP 6 –
Draft Revision to the Codex Classification of Food and Feed – Selected
Vegetable Commodity Groups (Roots and Tubers)

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

Subgroup 16A - Root vegetables

VR 2941 Cumin, black root
The EU would like to point out that according to the European and Mediterranean Plant Protection Organisation (EPPO), as well as according to Mansfeld's database\(^1\), *Bunium persicum* (Boiss.) B. Fedtsch is not black cumin.

*Bunium persicum* (Boiss.) B. Fedtsch is a plant from the *Umbelliferae* family. Its English name is “black caraway”. According to EPPO and Mansfeld's database black caraway - also known as black zira- is used as a root vegetable. The plant’s fruits are also used.

According to EPPO and to Mansfeld's database, black cumin is a plant from the *Ranunculaceae* family. Its scientific name is *Nigella sativa* L., syn. *Nigella truncate* Viv. and *Nigella indica* Roxb. Ex Flem. No indication on the use of roots is given. However, the seeds are used as a spice.

The EU therefore proposes to change the common name to:

**VR 2941 Caraway, black root**

*Bunium persicum* (Boiss.) B. Fedtsch.

Subgroup 16C - Aquatic root and tuber vegetables

a) VR 3003 Olbanggae
   The EU would like to point out that according to the FAO\(^2\), *Eleocharis kuroguwai* Ohwi is a weed and therefore questions the addition of a weed to the list of aquatic root and tuber vegetables.

b) VR … Water chestnut
   *Trapa natans* L.
   Water chestnut is an aquatic plant that forms nut-like fruits that can be eaten. The EU would recommend deleting this plant from the group of root and tuber vegetables.

c) VR … Water Bamboo
   *Zizania latifolia* (Griseb.) Turcz ex Stapf
   Water bamboo is an aquatic plant. Flowers, roots, seeds, and stems can be eaten (www.pfaf.org, www.issg.org). It is reported that the rhizomes and basal parts of the culms of *Z. latifolia* are edible. The EU supports the inclusion of this plant within the group of aquatic root and tuber vegetables.

d) VR … Foxnut
   *Euryale ferox* Salisb.
   Foxnut is an aquatic plant producing fruits. Fruits, the seed within the fruit, and the stems can be eaten. The EU would recommend deleting this plant from the group of root and tuber vegetables.