The European Union (EU) would like to thank the Electronic working group led by the Netherlands and the United States of America for the preparation of the proposed draft revision of the Classification of Foods and Animal Feeds for pulses. The EU supports the recommendation of the eWG to keep this group at Step 7 until finalisation of all vegetable commodity groups, but wishes to re-iterate its comment made at CCPR 46:

The EU considers it more appropriate to include the species Bambara groundnut (*Vigna subterranea*; syn: *Voandzeia subterranea*) and Kersting's groundnut (*Macrostyloma geocarpum*; syn: *Kerstingiella geocarpa*) in a separate subgroup (15C "groundnuts"). Since the edible parts of these species develop underground, this classification would be more appropriate than the current proposal, which includes Bambara groundnut and Kersting's groundnut in the subgroup 15A "Dried beans without pods".