

**European Union comments on
Codex Circular Letter CL 2017/16-FFV:
Draft Codex Standard for Fresh Dates**

Mixed Competence

Member States Vote

Paragraph & section number	Original text	Proposed text	Reason for the change/inclusion
2.	2 nd sentence: Other forms such as pieces or mashed dates or dried or dates intended for industrial purposes are excluded.	Other forms such as pieces or mashed dates, or dried dates or fresh dates intended for industrial processing are excluded.	Editorial changes, improving the readability and “processing” is term used in the standard layout.
3.1	<ul style="list-style-type: none"> • sound; 	<ul style="list-style-type: none"> • sound, produce affected by rotting or deterioration such as to make it unfit for consumption is excluded, 	Amendment in conformity with the standard layout.
3.1	<ul style="list-style-type: none"> • free from living pests, insect eggs and mites; 	<ul style="list-style-type: none"> • free from living pests, insect eggs and mites whatever their stage of development; 	In fresh dates no living pests no matter which genus/species or stage of development is allowed.
3.1	<ul style="list-style-type: none"> • Free from pest damage, including the presence of dead insects, their debris or excreta 	<ul style="list-style-type: none"> • Free from damage caused by pests affecting the flesh, and free from presence of dead insects, their debris or excreta / Practically free from pest of damage caused by pest, including the presence of dead 	Inclusion of “affecting the flesh”, in line with other standards. / In line with standard layout

		insects, their debris or excreta	
3.1	<ul style="list-style-type: none"> free of blemished fruit; i. e. fruit scarred, discoloured or sunburnt, or having blacknose (noticeable darkening of the head, generally accompanied by severe checking or cracking of the flesh) or side-spot (a very dark patch extending into the flesh) or similar abnormalities affecting an area of not more than 7 mm of total surface area of the fruit; 	<ul style="list-style-type: none"> free of blemished fruit; i. e. fruit scarred, discoloured or sunburnt, or having blacknose (noticeable darkening of the head, generally accompanied by severe checking or cracking of the flesh) or side-spot (a very dark patch extending into the flesh) or similar abnormalities affecting an area of not more than 7 mm of total surface area of the fruit; 	<ol style="list-style-type: none"> The sentence is not properly finalized, it does not say whether the 7 mm spots are allowed or not. This minimum requirement, (probably) defining a tolerance of for fruit showing defects not exceeding 7 mm of the total surface area, is in contradiction to the provisions for blemishes in Classes I (3.2.2: 5 % of the total surface area) and II (3.2.3: 10 % of the total surface area). Thus, it is recommended to define the limits for blemished fruit in the Classes only.
3.1.2	<p>Last sentence: Moisture content range from 45-65% for khalal¹ stage (partially ripe); 30-45% for rutab² stage (fully ripe) and less than 26-30% for tamar³ stage (semi-dry).</p> <p>¹ khalal (partially ripe) stage of date fruits which are consumed fresh. ² rutab (fully ripe) stage of date fruits which are consumed fresh. ³ tamar (Semi dry) stage of date fruits which are consumed fresh.</p>	<p>Last sentence: Moisture content range from 45-65% for khalal⁴ stage (partially ripe); 30-45% for rutab² stage (fully ripe) and less than 26-30% for tamar³ stage (semi-dry).</p> <p>⁴ khalal (partially ripe) stage of date fruits which are consumed fresh. ² rutab (fully ripe) stage of date fruits which are consumed fresh. ³ tamar (Semi dry) stage of date fruits which are consumed fresh.</p>	The footnotes are redundant. The explanation of the respective stage of development is given in the text in brackets.
3.2.2	Slight defects in shape and colour	<ul style="list-style-type: none"> Slight defects in shape Slight defects in colour<u>ing</u> 	Editorial change to show that it concerns 2 types of defect – in line with standard layout

3.2.3	Slight defects in shape and colour	- Slight defects in shape - Slight defects in colouring	Editorial change to show that it concerns 2 types of defect – in line with standard layout
4.	A. When sized by count, size is determined by the number of individual dates per package.	A. When sized by count, size is determined by the number of individual dates per package. <u>The following tables are guides and may be used on an optional basis.</u>	This amendment is copied from the provisions in 4.B. and is necessary to show that there is no obligation to apply exactly the sizing provisions as described in the tables.
4.	B. a) When sized by weight	B. a) When sized by weight, <u>the maximum difference between the largest and the smallest date in the package is defined as follows:</u>	We understand the figures in the table as maximum difference in size. It is recommended that the text clearly specifies the purpose of the figures.
4.	B. a) Pits (stones): Not more than two pits or 4 pieces of pits per 100 dates (in pitted dates)	C. a) Pits (stones): Not more than two pits or 4 pieces of pits per 100 dates (in pitted dates).	This tolerance should be moved to 5.1 quality tolerances.
4.	A. (b) Pitted dates		This is not intact. Should it be mentioned in minimum requirements that pitted is allowed?
4.	B. b) When graded	<u>B. b) When graded a grade (size code) is applied, the following size ranges apply:</u> Delete: columns “Designation” and “Description”	The text should specify what “grading” means. The designations are redundant when a grade is defined. The designations are related to quality defects, while we are in the section on sizing.
5.1	Quality tolerances		Please find the amended table at the end of this document. This table should not mention

			<p>specifically the defect "blemished/discoloured" as this defect does not affect the edibility of the fruit.</p> <p>Not in favour of the detailed table. If we have 4% discoloured fruits in Extra Class, this is within the 5% tolerance, but more than 3%. This lot should be rejected even though we are within the 5%.</p> <p>So the details make the standard stricter.</p>
6.1	1 st paragraph, 1 st sentence: The contents of each package must be uniform and contain only dates of the same origin, variety or commercial type, quality and size (if sized).	1 st paragraph, 1 st sentence: The contents of each package must be uniform and contain only dates of the same origin, variety (if indicated) or commercial type, quality and size (if sized).	
6.1	4 th paragraph: Where the dates are presented in stems or clusters, there may be a maximum of 10 percent of loose dates.	4 th paragraph: Where the dates are presented in stems or clusters, there may be a maximum of 10 percent of loose dates.	Already covered in 5.1 quality tolerances.
7.1.1	Each package shall be labelled as to the name of the produce "Dates" and may be labelled as to name of the variety and/or commercial type.	Each package shall be labelled , if contents are not visible from outside , as to the name of the produce " Fresh-dates " and may be labelled as to name of the variety and/or commercial type (stage of development).	<p>The correct name of produce is "fresh dates" and this should be reflected by the labelling provisions.</p> <p>It is not possible to label the variety and the commercial type as the commercial type is – by definition – a mixture of varieties with similar external characteristics.</p>
7.2.2	Name of the produce "Dates" if the contents are not visible from the outside. Name of the variety and/or commercial type (optional).	Name of the produce " Fresh dates " if the contents are not visible from the outside. Name of the variety and/or commercial type (stage of	<p>The question is whether "commercial type" in this context should be replaced by "stage of development".</p>

		development) (optional).	
7.2	Each package must bear the following particulars, are readable from the outside); or in the documents accompanying the shipment and attached in a visible position inside the transport vehicle.	Each package must bear the following particulars, ... are readable from the outside); or in the documents accompanying the shipment and attached in a visible position inside the transport vehicle. <u>For produce transported in bulk, these particulars must appear on a document accompanying the goods, and attached in a visible position inside the transport vehicle. Unless the document is replaced by an electronic solution. In that case the identification must be machine readable and easily accessible.</u>	Packages must be labelled a replacement by the accompanying documents is not an alternative. In case produce is presented in bulk in the transport vehicle, specific labelling requirements apply. The text proposed is in line with the standard layout
7.2.4	<ul style="list-style-type: none"> • Crop year (optional) 	<ul style="list-style-type: none"> • Crop year (optional) 	Is it possible to offer fresh dates of previous seasons? If yes, the proposed deletion is obsolete.

Defects Allowed	Extra Class	Class I	Class II
a) <u>Total Tolerances for produce not satisfying the minimum requirements</u>	5	10	15
Of which no more than			
- Soil (<u>soiled fruit?</u>)	0.25	1	1
- undeveloped	1	2	4
- Damaged by pest	3	8	12
- Blemished/discolored	3	5	7
- Sour Fermented/decayed/moldy	0	1	1
- Live insects <u>Living pests</u>	0	0	0
b) <u>Size tolerances (if sized)</u>			
Off size For produce not conforming to the size indicated	5	5	5
c) <u>Tolerances for other defects</u>			
<u>Fresh dates not belonging to the variety indicated</u>	2	2	2
Loose <u>fresh</u> dates among stems or clusters	10	10	10
Pits in pitted fresh dates	Not more than two pits or 4 pieces of pits per 100 dates		