

**European Union comments on
Codex Circular Letter CL 2021/79-FFV:
Request for proposals on new work for the Committee on Fresh Fruits and
Vegetables**

**Mixed Competence.
Member States Vote.**

In response to the request for comments, the European Union and its Member States (EUMS) would like to make the following comments:

Review of existing standards in order to ensure their alignment with the Standard Layout and consider necessary updates

CCFFV adopted a Standard Layout in 2017 that has been very helpful in the standards adopted since then. There are currently 41 standards for Fresh Fruit and Vegetables, out of which 36 are not aligned with the current Standard Layout. As a result, traders and inspectors are faced with different requirements and are not able to take full advantage of the benefits achieved with the requirements in the Standard Layout.

The EUMS suggest that all standards drafted or revised prior to 2018 be aligned with the current Standard Layout.

In this context, a working group should check in each case whether the standard is still up-to-date in all its specific requirements and still corresponds to the production and trade conditions. For example, for the standard for papaya (CXS 183-1993) the provisions for the indication of the size in papaya do not correspond to the practice of the trade. Section 6.2.4 currently states:

- Size (size code or average weight in grams);
- Number of units (optional);

However, the industry usually only indicates the number of units and does not use the size code specified in the standard or a weight specification. The EUMS therefore propose to amend section 6.2.4 as follows:

“Size expressed in accordance with any one of the following methods:

- Count,
- Size code and range,
- Size range.”