

European Union comments on
Codex Circular Letter CL 2017/17-FFV

Proposed layout for Codex standards for fresh fruits and vegetables

Mixed Competence

Member States Vote

Specific Comments:

Paragraph and section number	Original text (as proposed in the Appendix of CX/FFV 17/20/10 July 2017)	Proposed text	Reason for the change/inclusion
1. Scope	This Standard applies to <part of the produce being standardized of> commercial varieties (c u l t i v a r s) of { name(s) of produce} grown from {Latin botanical reference}1 f r o m t h e {Latin botanical reference}1 f a m i l y to be supplied fresh to the consumer <{Name of produce} for industrial processing is/are excluded.>	This Standard applies to <part of the produce being standardized of> commercial varieties (c u l t i v a r s) of { name(s) of produce} grown from {Latin botanical reference}1 f r o m t h e {Latin botanical reference}1 f a m i l y to be supplied fresh to the consumer <{Name of produce} for industrial processing is/are excluded.>	The concept of commercial varieties is unclear and not necessary, it could create confusion with " commercial type" which is used in the standard layout.
3.1	Minimum requirements	Minimum requirements	Typing error
3.1 Minimum requirement	<practically free of damage caused by pests {For fresh fruits and vegetables with edible skin ² > {or}; ² The provision for pests applies without prejudice to the applicable plant protection rules applied by governments in line with the International Plant Protection Convention (IPPC)	<practically free of damage caused by pests {For fresh fruits and vegetables with edible skin²} {or} ; ² The provision for pests applies without prejudice to the applicable plant protection rules applied by governments in line with the International Plant Protection Convention (IPPC)	This requirement should remain as optional for all fruits, it is not always obvious to determine if the skin is edible or not: e.g. kiwifruit.
3.1 Minimum requirement	<free of damage caused by pests affecting the flesh {for fresh fruits and vegetables with inedible skins or skins that are peeled off prior to consumption ² >; ² The provision for pests applies without prejudice to the applicable plant protection rules applied by governments in line with the International Plant Protection Convention (IPPC)	<free of damage caused by pests affecting the flesh {for fresh fruits and vegetables with inedible skins or skins that are peeled off prior to consumption²} {or} ; ² The provision for pests applies without prejudice to the applicable plant protection rules applied by governments in line with the International Plant Protection Convention (IPPC)	Fruit and vegetables with edible skin should also be free of damage caused by pests affecting the flesh;
5.1 Quality tolerance	{The tolerances for decay may be established depending on the characteristics / nature of produce}.	{The tolerances for decay in Class I and in Class II may be established depending on the characteristics / nature of produce}.	There is a consensus to have tolerance for decay in Class I and II but not in

									"Extra" Class.
5.1.1 "Extra Class"	Five percent 5.0%, by number or weight, of {name of produce} not satisfying the requirements of the class, but meeting those of Class I. Included therein, is one percent tolerance for decay, soft rot and/or internal breakdown. {Add possible tolerances for individual defects, depending on the nature of the produce}				Five percent 5.0%, by number or weight, of {name of produce} not satisfying the requirements of the class, but meeting those of Class I. Included therein, is one percent tolerance for decay, soft rot and/or internal breakdown. {Add possible tolerances for individual defects, depending on the nature of the produce}				See justification below
<p>"The scope of the standard (section 1) takes into account that fruit and vegetables are perishable produce and that – depending on the conditions and time between packer/dispatcher and final seller (e.g. retailer) – there is a certain risk that the produce may deteriorate:</p> <p>"However, if applied at stages following packaging, products may show in relation to the requirements of the standard a slight lack of freshness and turgidity and for produce graded in classes other than the "Extra Class", a slight deterioration due to their development and their tendency to perish."</p> <p>Even in this scope, Extra Class produce have a special position / quality.</p> <p>In the next paragraph it is clearly specified that the holder/seller is responsible for observing the conformity of the produce with the respective standard. Thus, the producing/exporting countries must not be concerned about a zero-tolerance for decay on subsequent marketing stages. It will always be the holder/seller in the country of destination who must take care that provisions for the respective class are met; eventually he/she must re-grade the produce to guarantee that the consumer finally receives a produce in conformity with the indicated Extra Class without any decay.</p>									
OPTION 2	"Detailed table for tolerances"				<u>Detailed</u> table for tolerances"				No detailed table: If we allow for example 3% shriveled fruits in Extra Class, and we have a lot with 4% shriveled fruits, this is within the 5% tolerance, but more than 3%. This lot should then be rejected even though we are within the 5%. So the details make the standard stricter.
OPTION 2 – Classification/Tolerances	Quality Tolerances	Extra Class	Class I	Class II	Quality Tolerances	Extra Class	Class I	Class II	There is no tolerance for decay in "Extra" Class, see justification above
	
	Decay, soft rot, internal breakdown	1	1	2	Decay, soft rot, internal breakdown	<u>1-0</u>	1	2	
6.1 Uniformity	<However, a mixture of {name of produce} of distinctly different <species> <varieties> <commercial types> <colours> may be packed together in a <package> <sales package>, provided they are uniform in quality and, for each <species> <variety> <commercial				<However, a mixture of {name of produce} of distinctly different <species> <varieties> <commercial types> <colours> may be packed together in a <package> <sales package>, provided they are uniform in quality <u><, size></u> and, for each				To be coherent with the sentence "{It is recommended, not to require uniformity in size for this type of

	type> <colour> concerned, in origin.> {It is recommended, not to require uniformity in size for this type of mixtures.}	<species> <variety> <commercial type> <colour> concerned, in origin.> {It is recommended, not to require uniformity in size for this type of mixtures.}	mixtures.}"
6.2 Packaging	<Stickers individually affixed to the produce shall be such that, when removed, they neither leave visible traces of glue nor lead to skin defects.>	<Stickers individually affixed to the produce shall be such that, when removed, they neither leave visible traces of glue nor lead to skin defects.>	The requirement regarding stickers should be required for all F&V, in line with UNECE standards].
6.2 Packaging	6.2.1 Description of Containers The container shall meet the quality, hygiene, ventilation and resistance characteristics to ensure suitable handling, shipping and preserving of the {name of produce}. Packages < (or lots for produce presented in bulk)> must be free of all foreign matter and smell.	6.2.1 Description of Containers The container shall meet the quality, hygiene, ventilation and resistance characteristics to ensure suitable handling, shipping and preserving of the {name of produce}. Packages < (or lots for produce presented in bulk)> must be free of all foreign matter and smell.	This title is not necessary and creates confusion as the code of practice CAC/RCP 44-1995 includes also requirement for containers.
7.1.1 Nature of Produce	Each shall be labelled as to the name of the produce and may be labelled <as to <name of the variety> <and/or commercial type>.	Each package shall be labelled as to the name of the produce if the produce is not visible from the outside , <and may be labelled as to <name of the variety> <and/or commercial type>.	The option to require the name of the variety /commercial type should exist.
7.1.1	Nature of Produce	Name Nature of Produce	As suggested by CCFL43
7.2.2	Nature of Produce	Name Nature of Produce	As suggested by CCFL43
New section at the end of the Codex Standard		< NOTE: The UNECE has published the Standard FFV-xx {identification number of the standard} concerning the marketing and commercial quality control of {name of the produce}. This Standard is available at: <a "="" agriculture="" brochures="" fruit-vegetables="" href="https://www.unece.org/...{link to the UNECE standard}>

< The OECD Scheme for the Application of International Standards for Fruit and Vegetables has published an explanatory illustrated brochure on the application of this standard. The publication may be obtained from the OECD bookshop at: http://www.oecd.org/agriculture/fruit-vegetables/publications/brochures/ >	It is relevant information for producers and traders. Necessity of transparency. This will avoid unnecessary barrier to trade.