

## European Union comments on Circular Letter CL 2021/86/OCS-FFV Request for comments at Step 3 on the Proposed draft Standard for fresh dates

### *Mixed Competence Member States Vote*

The European Union and its Member States (EUMS) propose the following amendments to the draft standard:

#### **1. SCOPE**

The scope of Codex standards is after preparation and packaging and is not restricted to export control stage. The EUMS propose to modify the first sentence as follows: *“The purpose of the standard is to define the quality requirements for fresh dates ~~at the export control stage~~ after preparation and packaging.”*

#### **2. DEFINITION OF PRODUCE**

The last part of the first sentence should be deleted as “after preparation and packaging” is already mentioned in the scope. *“This Standard applies to commercial varieties of Fresh Dates (*Phoenix dactylifera* L. from *Arecaceae* family), to be supplied fresh and whole to the consumer in unpitted form ~~after preparation and packaging.~~”*

#### **3. PROVISIONS CONCERNING QUALITY**

##### **3.1 MINIMUM REQUIREMENTS**

The following indents should be inserted after “pest damage” as these are important minimum requirements:

- “free from mould filaments visible to the naked eye.
- free of fermentation “

##### **3.1.1. Minimum maturity requirements**

In the second paragraph, the term “not exceeding 85 %” is in contradiction to the subsequent indents on moisture content related to the ripening stage and should be deleted. Moreover, the introductory sentence to the moisture contents should be specified: *“Dates shall have a moisture content ~~not exceeding 85%~~, in accordance with criteria to the variety and stage of harvest/or commercial type and the area in which they are grown. The moisture content should not exceed be within the following range:”*

Footnotes: The acceptable moisture contents are defined in the main text. For simplification, the moisture content should be deleted in the footnotes:

*“Footnote 3: rutab: Means soft or moist fully ripe stage, color changes to light brown and starts to lose weight and accumulate more sugars (mainly reducing sugars) (~~water content 30-45%~~).*

*Footnote 4: tamer: Full ripe stage of development, more water loss and gains more sugars and depending on variety attains a high sugar-to-water ratio (low moisture content 10-25%).*“

## **5. PROVISIONS CONCERNING TOLERANCES**

### **5.1 QUALITY TOLERANCES.**

The definition of "total tolerance" is confusing and should be made clearer. The total tolerance applies to all possible defects, of which certain defects should not exceed an individual tolerance. The EUMS propose the following wording: *“Tolerances for produce not satisfying the provisions concerning quality”*.

In the table under point 1. “Individual Tolerance” the following text should be added *“of which no more than, i.e. Individual tolerance”*.

The heading for Class II should be adapted to *“Class II or unclassified product”*. As classification is optional in point 3.2., it has to be possible to apply tolerances for unclassified products.

With respect to the tolerances allowed in Class II, the total tolerance should be 20 %. This tolerance of 20 % has already proven itself in international trade. *“~~10~~ 20 % total tolerance for Class II”*.

## **6. PROVISIONS CONCERNING PRESENTATION**

### **6.1 UNIFORMITY**

Concerning the first sentence, as the eating quality and moisture content is different with respect to the ripening stage, these stages should not be mixed in a package. The EUMS propose to modify the first sentence to: *“The contents of each package must be uniform and contain only dates of the same origin, variety or commercial type, stage of ripeness, quality (if indicated) and size (if sized).”*

#### **7.1.1 Name of produce**

There seems to be an editorial error. The sentence should be corrected to: *“Each package shall be labelled as fresh dates (stage of ~~dates~~ ripeness as per 3.1.1) and may be labelled as to the name of the variety and/or commercial type”*.

### **7.2 NON-RETAIL CONTAINERS**

CXS 346-2021 is not explicit enough to provide proper information as to the produce and the standard applied. Thus, more information is necessary – especially as the produce in non-retail containers is not visible from the outside. The EU MS propose to add the following text:

*“The labelling of non-retail containers should be in accordance with the General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021).*

*In addition, the following particulars must be indicated on each non-retail container:*

- “Dates”, when the contents are not visible from the outside*
- Name of the variety (optional)*

- Stage of ripeness
- Type of presentation as to “clusters”, “in stems” where appropriate
- Origin of produce
- Class (optional)
- Size (if sized) in accordance with the method applied.”