

**European Union comments on Circular Letter CL 2021/85/OCS-FFV  
Request for comments at Step 3 on the Proposed draft Standard  
for berry fruits**

*Mixed Competence  
Member States Vote*

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

## 2. DEFINITION OF PRODUCE

In number 12, the common name in English should be indicated.

*“12. ~~Mortino~~ Columbian blueberry (*Vaccinium floribundum Kunth*)”*

For Number 16 Camu (*Myrciaria dubia*) it needs to be clarified whether this fruit is internationally traded as a fresh fruit for the final consumer or only to processing. If it is for processing only, Camu (*Myrciaria dubia*) cannot be covered by this standard.

Number 17 should be deleted or corrected. The correct species name is Jabuticaba (*Plinia peruviana* (Poir.) Govaerts). It is a stone fruit, not a berry fruit. The Jabuticaba is highly perishable. It needs to be clarified whether it is internationally traded as a fresh fruit for the final consumer or only sold locally. If no agreement on deletion can be reached, the taxonomy should be correct: According to GRIN, *P. trunciflora* is the synonym to *P. peruviana*. See <https://npgsweb.ars-grin.gov/gringlobal/taxon>

Number 18, Strawberry-Guava (*Psidium cattleianum* Sabine), should be deleted and integrated in CODEX STANDARD FOR GUAVAS (CODEX STAN 215-1999, AMD. 1-2005). If no agreement on deletion can be reached, the typographical error should be corrected (*Psidium cattleyanum* Sabine) See <https://npgsweb.ars-grin.gov/gringlobal/taxon>

Number 20, Elderberry (*Sambucus nigra*) should be deleted. This fruit is not traded on the fresh market but for processing only. Thus, it cannot be covered by this standard.

## 3. PROVISIONS CONCERNING QUALITY

### 3.1 MINIMUM REQUIREMENTS

The indents should be modified as follows:

- ***intact***
- *fresh in appearance;*
- *sound; berries, affected by rotting or deterioration such as to make it unfit for consumption is excluded;*
- ~~*firm;*~~
- *clean, .....*
- *free of any foreign smell and/or taste; including bitter taste in case of bilberries*
- *free of damage ...*

It is essential that berries are intact, otherwise they will not have any shelf life, so a new indent should be added. Berry fruit are soft by nature. Thus, it is not very helpful to require “firmness”. This indent should be deleted. It is important to refer to this specific defect in bilberries.

### 3.1.1 Minimum Maturity Requirements

The original wording gives the impression that all berry species are climacteric. As they are not, the EUMS propose a more open wording:

*“The berries must **be sufficiently developed and display satisfactory maturity and/or ripeness according to the species** have reached an appropriate degree of development and/or maturity in accordance with the criteria to the specie, variety, commercial type and to the area in which they are grown, that allows the proper development of its organoleptic characteristics.”*

### 3.2.2. Class I

No producer or trader sorts berry fruits for defects in shape, color or skin. Color does play a role only as an indicator for ripeness and this is covered by section 3.1.1. Slight damage should be specified with respect to the susceptibility. The EUMS propose to modify the indents as follows:

- ~~“slight defects in shape;~~
- ~~slight defects in coloring, depending on the specie and variety;~~
- ~~slight skin defects;~~ **and**
- ~~slight damage.~~
- **very slight leakage of juice**
- **very slight bruising**”

### 3.2.3 Class II

Again, the indents on shape, coloring, skin and damage should be deleted. In Class I, only a very slight leakage of juice is allowed. Thus, in context of a normal progression from Class I to Class II “a slight“ leakage only should be allowed. The EUMS propose to modify the indents as follows:

- ~~“defects in shape;~~
- ~~defects in coloring, depending on the specie and variety; and~~
- ~~skin defects.~~
- **slight leakage of juice**
- **slight bruising**”

## 5.1. QUALITY TOLERANCES

This section grants tolerances and not “the measuring” of tolerances. A size tolerance can only be granted if sized. Thus the first sentence should be amended to:

*“At all marketing stages, ~~measuring~~ tolerances in respect of quality and size **(if sized)** shall be allowed in each lot for produce not satisfying the requirements of the class indicated.”*

## 6. PROVISIONS CONCERNING PRESENTATION

### 6.1 UNIFORMITY

Cultivated berries should be uniform in variety or commercial type, while berries picked in the wild can only be uniform as to species. The first sentence should be amended as follows:

*“The contents of each package must be uniform and contain only berries of the same origin, ~~species~~, variety or commercial type or, in the case of wild berries, species, quality, colour and size (if sized).”*

This provision on ripeness in Classes Extra and I should be a general one and not be linked to berries in mixtures only. The EUMS propose to put the last sentence as a separate, second paragraph:

*“Berry fruits in Class “Extra” and Class I must be practically uniform in ripeness.*

*However, a mixture of berries of distinctly different species and/or varieties may be packed together, as long as they are uniform in quality and each species and/or variety being from the same origin. ~~Berry fruits in Class “Extra” and Class I must be practically uniform in ripeness.~~”*

## 7. PROVISIONS CONCERNING MARKING OR LABELLING

### 7.1.1 Name of Produce

This provision related to “wild” is a general one and should not be linked to berries in mixtures only. The EUMS propose again to put the last sentence as a separate, second paragraph:

*“ “Wild” or equivalent denomination may be included, where appropriate.*

*Each package may be labelled “Mixture of berry fruits”, in the case of a mixture of distinctly different species and/or varieties of berry fruits. The species and/or varieties in the package must be indicated. ~~“Wild” or equivalent denomination may be included, where appropriate.~~”*

### 7.2.2 Nature of Produce

On non-retail containers the term “mixture of berries” should appear in order to clearly inform the consumer. Just a list of varieties is not clear enough. The last sentence should be amended to:

*~~“In the case of a mixture of berries of distinctly different varieties, names of the different varieties.~~ “Mixture of berries”, or equivalent denomination, in the case of a mixture of distinctly different species. If the produce is not visible from the outside, the species and/or varieties in the package must be indicated.”*

### 7.2.4 Commercial Specifications

Sizing is optional. The size indication should be in accordance with the method applied. The indent on size should be reworded. Furthermore, berry fruits have a short shelf life. There is no need nor trade habit to indicate the crop year. Even the optional indication is not common in trade. Thus the indent on crop year should be deleted.

- ~~“Weight or s~~Size expressed in accordance with the method used (if sized);
- ~~Crop year (optional);”~~