

Codex Committee on Processed Fruits and Vegetables

(Working by correspondence)

European Union comments on

Agenda Item 6:

**Proposed Draft General Standard for Dried Fruits (Step 4)
(CX/PFV 19/29/6)**

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) would like to thank Thailand and the Republic of Korea for chairing the electronic working group and preparing the discussion paper.

The EUMS note that the draft standard covers a wide range of dry and dried produces (DDP). The EUMS do not consider that a single standard adequately covers such a wide range of dry and dried produces. The EUMS consider that at least two separate standards should be elaborated respectively for DDP with addition of ingredients like sugars or syrups or salt and DDP without any further processing or addition of ingredients. The impact on consumers' health and the information to be provided to consumer for those two types of products are in fact different and such difference should be reflected adequately in separate standards.

In particular, regarding the preservation treatment, item 2.1 (5), the draft distinguishes between "Untreated dried fruit" and "Treated dried fruit". The addition of sugars and preservatives are handled together, in the treated dried fruit category, suggesting that the two product categories are equivalent. The EUMS consider these as two separate categories and wish this to be reflected in the draft. "Salting" and "addition of sugar" should be deleted and a third category of products should be created that mentions the addition of salt or sugar ("candied fruits").

As a general comment the EUMS do not support the use of sweeteners and colours in dried fruit as such uses are not technologically justified. The EUMS distinguish between "dried fruits" and "candied fruits", the latter having rather a character of confectionary products for which the use of colours and sweeteners (the use of sweeteners is justified only for energy-reduced and no added sugars products) would be technologically justified.

The EUMS are also seeking a clarification why dried fruits need flavourings and whether the use of flavourings would not mislead the consumer as regards the nature and quality of the products.

The EUMS take note that the existing standards on raisins (CXS 67-1981), dried apricots (CXS 130-1981) and dates (CXS 143-1985) limit the food additive uses to a few provisions of specific additives, however, they do not clarify to what functional classes those additives belong.

The EUMS also observe that the general part of the standard refers to several functional classes (see page 9 of CX/PFV 20/29/6). The discussion paper explains that the technical justifications for the inclusion of functional classes were provided by EWG members (para 14, CX/PFV 20/29/6), however, without providing further details on the arguments submitted in favour of the functional classes listed.

The EUMS would like to stress that the technological need for food additives depends on the character of the products and on other optional ingredients allowed and thus the discussion on the appropriate food additive uses cannot be concluded if there are open questions on some other aspects of the standard.

In summary, the EUMS consider that a further discussion on the food additive provisions for the general part of the draft standard is needed.

As for the specific Annexes, the EUMS consider that the agreed alignment approach should be followed so that the food additive provisions of the standard are appropriately captured in the GSFA. In order to do so, the Committee would need to clarify the functional classes of the additives listed in CXS 67-1981, CXS 130-1981 and CXS 143-1985.

In addition, the EUMS note that this draft standard is likely to cover products for which international standards already exist (e.g.: UNECE Standard for Prunes). The EUMS oppose the addition of prune in the Table provided in item 2.3 “List of species and varietal types” (which indicates examples of species covered by the draft standard). The EUMS suggest to introduce a specific annex for Prune and would offer to prepare a draft proposal for such an Annex.