21/10/2024

European Union comments on

CL 2024/80-CAC

Request for comments on the proposed amendment to *General Standard for Fruit Juices and Nectars* (CXS 247-2005): Minimum brix level for grape juice from *Vitis labrusca* or hybrids thereof

European Union Competence
European Union Vote

The European Union (EU) would like to thank Brazil for providing additional information and explanation and for preparing this second draft for consultation.

The EU understands that the proposed amendment to the *General Standard for Fruit Juices and Nectars* (CXS 247-2005) is the same as for the consultations of the electronic working group (EWG) carried out this year, i.e. Brazil is proposing to keep the Brix level of 16 °Brix for grape juices of *Vitis vinifera* or hybrids thereof, and adding a text with a proposed minimum Brix level of 14 °Brix for reconstituted grape juice from *Vitis labrusca L*. and hybrids thereof, if it comes from countries of which the production is consistently lower than 16 °Brix.

The EU appreciates the information provided by Brazil but reiterates its concerns expressed in the feedback to the EWG consultations.

The EU would like to emphasise that lowering the Brix could could lead to a deterioration in the intrinsic quality of the products and complicate quality control. Achieving the 16 Brix minimum is realistic for all direct-producing grape varieties, and maintaining current thresholds is important for consumer protection. Lower sugar content, considering the global trend of climate change, could lead to early harvesting when the crop is not yet fully ripe, adversely affecting the product's intrinsic quality and flavour profile due to potentially increased acidity.

In order to determine whether the °Brix needs to be changed, the evaluation of average °Brix for reconstituted grape juice form worldwide data sources would be needed, and not only data from a single region of a single Codex member. At this stage, worldwide data justifying a review of the standard have not been provided.

The data provided are restricted to one region of Brazil and show that the average °Brix level for juices from *Vitis labrusca* and hybrids thereof in the years of 2020-2023 in this region was higher than 16 °Brix, only the data of 2024, which are most probably not yet complete, are below. Thus, it appears that the majority of Brazil’s production complies with the limit of 16 °Brix.

The EU reiterates its view that it would be useful to have information on how would *Vitis vinifera* do under the same cultivation conditions which is an important scientific basis to justify to treat them in a different way.

Adulteration of fruit juices and nectars is a significant issue in the industry, and lowering the minimum Brix level for *Vitis labrusca* juices could make it more difficult to detect such practices. As isotopic analyses to some extend are suitable to detect not allowed water addition, in this case it can hardly be done because grape juices usually concentrated up to about 65 °Brix, no matter if the original juice had a value of Total Soluble Solid of more than 14 or 16 °Brix.

The amount of needed water during reconstitution to get grape juice of 16 (or 14) °Brix from this concentrate is than the same.

Even if the proposed amendment would include the specification of a maximum °Brix level of concentrate of grape juice of *Vitis labrusca* or hybrids thereof that is lower than that of concentrate of grape juices from *Vitis vinifera* and hybrids thereof (what is not mentioned in the amendment), there is no method known to distinguish the grape juices from *Vitis vinifera* from those from *Vitis labrusca* properly.

The introduction of different °Brix values would require a new method to be added to the *General Standard for Fruit Juices and Nectars* (CXS 247-2005) in order to differentiate between the two types of grape juices. Furthermore, the proposed lower Brix level could complicate the control of the products. Currently, it is observed that 50% of reconstituted fruit juices are produced by adding water, making O18 isotopic analysis cumbersome in determining the precise amount of added water.

The EU is thus of the opinion that the information that is currently available does not justify the proposed amendment.