

## European Union comments on Circular Letter CL 2021/84/OCS-FFV Request for comments at Step 3 on the Proposed draft Standard for onions and shallots

### *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**

The botanical names need to be corrected. “Grey shallots” is the common name for the species “Allium oschaninii,” it is not a colour type of shallots. “Allium ascalonicum” is the old name of the “Allium cepa Aggregatum” group.

*“This standard applies to onion bulbs of varieties grown from Allium cepa L. Cepa group ~~and~~ Allium fistulosum L. of the Amarilidaceae family and shallot bulbs grown from Allium cepa ~~spp~~ Aggregatum group and grey shallots grown from Allium oschaninii O. Fedtsch. ~~and Allium ascalonicum group~~, to be supplied fresh to the consumer.”*

In the second indent, the EUMS propose an editorial correction: “Onions and shallots may be of the following skin colours: white, purple, pink, red, grey, ~~or~~ yellow, ~~and~~ or brown.”

#### **3.1.1 Sufficiently Developed**

Sufficient drying of the outer skins and firm bulbs are already required in the minimum requirements (3.1). The EUMS therefore propose to delete the second sentence of the first paragraph.

*“Onions and shallots must be sufficiently developed. ~~They must be firm, not soft or spongy and present dry outer skins that are dry and papery.~~”*

#### **3.2.1. “Extra” Class**

In the first paragraph, second sentence, the EUMS propose to change the term “denomination” to “type”, so that the same term is consistently used throughout the document.

*“They must be characteristic of the variety and/or commercial ~~denomination~~ type.”*

Furthermore, the indents and their introductory sentence can be deleted as the requirements for Extra Class are sufficiently described in the first paragraph.

*~~“The following slight defects, however, may be allowed, provided that they do not affect the general appearance of the produce, the quality, the keeping quality and presentation in the package:”~~*

- ~~a very slight defect in shape;~~
- ~~very slight defects in colouring;~~
- ~~very light staining, provided it does not cover more than one fifth of the bulb's surface;~~
- ~~for onions, bulbs should be free from doubles and/or double centres; and~~
- ~~for shallots, bulbs should be free from doubles or three bulbs.~~ “

### 3.2.2. Class I

While onions may have larger root tufts if harvested before complete maturity, grey shallots have long root tufts irrespective the time of harvest. The indents concerning bulbs should thus be modified. Furthermore, in principle, onion bulbs have one vegetative centre only. However, it cannot be excluded that onions may have more than one vegetative centre. Therefore, the last indent should be deleted.

“The bulbs must be:

- firm and compact;
- practically free of root tufts; however, for onions ~~and grey shallots~~ harvested before complete maturity and grey shallots, root tufts shall be allowed. ~~and~~
- ~~onion bulbs should be free from doubles and/or double centres.”~~

### 3.2.3 Class II

As this standard defines three classes, the introductory sentence of Class II must refer to Classes Extra and I, i.e. the higher classes.

“This class includes onions and shallots that do not qualify for inclusion in ~~Class I~~ the higher classes but satisfy the minimum requirements specified in section 3.1 above.”

Furthermore, as the staining in Class I may be 1/5 or 20 %, the staining in Class II should be more generous; the EUMS propose 50 % in the seventh indent. The wording should also be aligned with the language in Class I.

As the slight glassiness in Class I may affect one outer fleshy ring, the glassiness in Class II should be more generous; the EU MS propose two outer fleshy rings.

Since firm onions are already required in Class I, Class II should be somewhat less stringent and allow onions with slightly decreasing firmness.

- “~~stains~~ staining, provided ~~they do~~ it does not cover more than 25-50 % (~~a quarter~~ half) the bulb's surface;
  - cracks in the outer skins and partial absence of the skins on a maximum of one third of the bulb's surface, provided the flesh is not damaged; and
  - for onions, slight glassiness / translucence not exceeding ~~the~~ two outer fleshy rings;
- The bulbs must be reasonably firm.”

#### 4. PROVISIONS CONCERNING SIZING

**4.1, indent b:** The minimum size of 10 mm is proposed to be the unique minimum size for all shallots.

**“(b) Shallots:**

*The minimum diameter shall be:*

- *10 mm for ~~grey, pink, red, purple~~ shallots; and*
- *~~15 mm for other shallots.~~”*

#### 5. PROVISIONS CONCERNING TOLERANCES

##### 5.1.1 “Extra” Class

In Class Extra, the minimum requirements must be respected and the only tolerances should be granted for characteristics allowed in Class II. The second sentence should be modified as follows:

*“Within this tolerance not more than  $\pm 0.5$  % in total may consist of produce satisfying ~~neither the requirements of Class I II quality nor the minimum requirements, or of produce affected by decay.~~”*

##### 5.1.2 Class I

In the tolerance of Class I, it should be clearly specified that soft bulbs are assessed as bulbs having decay. The EUMS propose to apply the tolerance for the visible shoot growth to firm bulbs only.

*“Within this tolerance not more than 1% in total may consist of soft bulbs or produce satisfying neither the requirements of Class II quality nor the minimum requirements, or of produce affected by decay. In addition, 4.0%, by number or weight, of firm bulbs may present externally visible shoot growth not exceeding 1 cm.”*

##### 5.1.3 Class II

In the tolerance of Class II, it should also be clearly specified that soft bulbs are assessed as bulbs having decay. Since there is already a tolerance for 1 cm in length of visible shoots in Class I, Class II must be more generous. The EUMS propose not to limit the length of the shoots, but to require that the bulbs must be firm.

*“Within this tolerance not more than 2% ~~neither~~ in total may consist of soft bulbs or produce affected by decay. In addition, 10.0%, by number or weight, of firm bulbs may present externally visible shoot growth ~~not exceeding 1 cm.~~”*

#### 5.2. Size Tolerances

The sentence seems incomplete, “are allowed” should be added at the end:

*“For all classes, (if sized), 10.0% by number or weight of onions and shallots not satisfying the requirements as regards to sizing are allowed.”*

## **6. PROVISIONS CONCERNING PRESENTATION**

### **6.1 Uniformity**

Onions prepared according to marketing standards are marketed not only in packages, but also in bulk in sea containers. This must be reflected in the standard. The first sentence should be modified as follows:

*“The contents of each package (or lot for produce presented in bulk in the transport vehicle or compartment thereof) must be uniform and contain only onions or shallots of the same origin, variety or commercial type, quality and size.”*

#### **7.1.2 Origin of produce**

The same term as in the paragraph on mixtures as defined in 6.1 should be used. *“In the case of a mixture of distinctly different varieties or commercial types of onions or shallots of different origins, the indication of the country of origin shall appear next to the name of the variety, commercial type and/or colour concerned.”*

### **7.2. Non-retail Containers**

Non-retail containers must be labelled to guarantee the identification of the produce and the traceability. Thus, it is not acceptable that the labelling of the package is replaced by information provided in accompanying documents. Information particulars can only be presented in the documents accompanying the respective transport vehicle for bulk transports. The text in brackets should be maintained and adapted:

*[Each package must bear the following particulars, in letters grouped on the same side, legibly and indelibly marked, and visible from the outside ~~or in the documents accompanying the shipment.~~*

*For onions and shallot transported in bulk in the transport vehicle, these particulars must appear on a document accompanying the good,...]*

#### **7.2.1 Identification**

The identification code must be officially recognized, otherwise this information - even if it is optional - becomes arbitrary. If necessary, the UNECE code mark registry can be used as an official reference source.

*“Identification code officially recognized by the national authority from the country applying such a system [as listed in the UNECE database] (optional)”.*

#### **7.2.4 Commercial Specifications**

The second indent on variety can be deleted as it is a duplication of 7.2.2

- ~~Variety and/or commercial type (optional);~~