

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 4 (b)

CX/FFV 05/12/8
CX/FFV 05/12/8-Add.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES

*Twelfth Session,
Mexico City, Mexico, 16 - 20 May 2005*

Proposed draft Codex Standard for Apples

(At Step 3)

GOVERNMENT COMMENTS

(Argentina, Australia, European Community, New Zealand, Iran and Venezuela)

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ARGENTINA

Agenda Item 4 (b)

JUSTIFICATIONS

- In Section **1-DEFINITION OF PRODUCE** Argentina would like that “(cultivares” = “cultivars”) was placed after “commercial varieties” in order to keep the coherence with other Codex Standards (such as, Standard for Orange at Step 8).

-In clause **2.1. Minimum Requirements** Argentina has suggested the changes mentioned above so Spanish redaction can be improved. Likewise, the addition of two (2) requirements in the received proposal (CX/FFV 05/12/8) was considered as follows:

- practically free of bruising and/or large scarring due to damage skin;

- free of signs of internal dehydration and/or floury appearance;

This is because of fruits may suffer hits or bruises that scar subsequently during its growth and development, or during the harvest in the packaging factory, storage and transport. These damages impair the general appearance of produce with a concomitant reduction of its quality.

Defect “bruising” is defined in ANNEX II, proposal CX/FFV 05/12/8, so it must be mentioned in this paragraph 2.1

About the second requirement, even if this defect appears in a few important varieties in the World trade, such as Red Delicious and its clones, Gala, Braeburn, Golden Delicious, etc., its characteristic of lack of juiciness and sensation of pastiness give it an unpleasant texture deteriorating the produce quality.

2.2.1. The proposal of Argentina follows the CEPE Standard about the pulp of the fruit must be healthy .

About the stalk (stem) may be missing. Argentina agrees that for Class “Extra” the stalk may be missing; but according to the received proposal from Codex the allowed tolerance for this Class is not defined, so Argentina considers that the suitable tolerance would be 25% according to the regional Standards (MERCOSUR).

Sections 2.2.2. and 2.2.3. The Argentina proposal is according to UN/ECE Standard for Apples FFV-50. This proposal includes a section for injury produced by hail which produces important losses. Bruises for hail during the fruit development are well cicatrized, but the skin shows sunken zones and they form layers of cork located below. If the phenomena happens close to harvest, bruises in the almost mature fruit shall not scar well and other opportunist microorganisms are able to settle in there. The incorporation of this quality defect is considered important due to the characteristic of the injury which it provokes, wherewith it must be defined a specific tolerance according to the harmonized standards MERCOSUR.

-About Section **3. PROVISIONS CONCERNING SIZING**, it is recommended to decrease the uniformity tolerances and consider the minimum limits according to the technological development for the sizing of this produce.

-In Section **4- PROVISIONS CONCERNING TOLERANCES** Argentina believes that this paragraph should be replaced for the following text:

“Tolerances in respect of quality and size shall be allowed in each package for produce not satisfying the requirements of quality and class indicated below.”

- In Section **Quality Tolerances**, Argentina suggests to remove the phrase “... or, exceptionally, coming within the tolerances of that class” in “Extra” Class and Class I, because it is a redundancy.

About rotting , it was tried to assimilate to local standards.

-About Section **5-PROVISIONS CONCERNING PRESENTATION**, clause **4.1 UNIFORMITY**, we suggest to include in the first paragraph “variety”, and “degree of ripeness ”, because they form the produce uniformity. We also suggest to remove “... and may be of mixed varieties”, due to this is inconsistent with the uniformity concept in the way it is expressed.

The following suggestions are made to the right redaction and interpretation to the Spanish language: The second paragraph must comprise only the following sentence: “For “Extra” class, colour should be uniform.” . The following sentence should be forming the third paragraph from which “and/or sizes..” should be removed. The word “variety” should be changed for “varieties”.

Section 5.2 **PACKAGING** it is suitable to take in account the following logical order and the right wording in Spanish:

“Las manzanas deben estar envasadas de manera que el producto quede debidamente protegido”. (In English: “Apples must be packed in such a way as to protect the produce properly”)

“Las manzanas deberán disponerse en envases que se ajusten al Código Internacional de Prácticas Recomendado para el Envasado y Transporte de Frutas y Hortalizas.” “(In English: “Apples shall be packed in each container in compliance with the Recommended International Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables.”)

5.2.1. Description of Containers (idem PACKAGING)

The containers must ensure a suitable protection of the produce. The containers intended for direct sale to the consumer must be sufficiently rigid to ensure a proper protection of the produce.

The materials used inside the package must be new, clean, and of a quality such as to avoid causing any external or internal damage to the produce. The use of materials, particularly of paper or stamps bearing trade specifications is allowed, provided the printing or labelling has been done with non-toxic ink or glue.

Stickers individually affixed on the produce shall be such that, when removed, they neither leave visible traces of glue.

Packages must be free of all foreign matter.

-In Section **6-MARKING OR LABELLING**, clause **6.2 NATURE OF PRODUCE** we believe that even though the produce is visible from the outside, it is important to include the following information:

- Name of the specie
- Name of variety.
- In the case of consumer packages containing a mixture of apples of different varieties, names of the different varieties;

The above mentioned stimulates the knowledge of the produces where they are not well-known, precluding confusions and trade disloyalty.

Comments: - On section **1-DEFINITION OF PRODUCE** we suggest to write “(cultivares = cultivars)” in the Spanish text as follows: “Esta norma se aplica a las frutas de las variedades comerciales **(cultivares)** de *Malus domestica* Borkh.....”

-On clause **2.1. Minimum Requirements:** It should be considered the bold and underline changes. The labeled words should be removed so the paragraph be edited as follows:

In the Spanish text: “En todas las categorías, a reserva de las disposiciones especiales para cada categoría y las tolerancias permitidas, las manzanas deberán **estar**:

- whole;
- sound, produce affected by rotting or deterioration such as to make it unfit for consumption is excluded;
- In the Spanish text: limpias y prácticamente exentas de cualquier material extraña visible (clean, practically free of any visible foreign matter);
- **practically free of bruising and/or large scarring due to damage skin**
- **free of signs of internal dehydration and/or floury appearance**
- practically free of pests affecting the general appearance of the produce;
- practically free of damage caused by pests;
- practically free of damage caused by cold and/or freezing;
- free of abnormal external moisture, excluding condensation following removal from cold storage;
- free of any foreign smell and/or taste; and
- fresh of ~~internal~~ water core.

- In section **2.2. CLASSIFICATION**, section **2.2.1. "EXTRA" Class** the following text in Spanish should be changed as follows:

“Las manzanas de esta categoría deben ser de calidad superior y características de la variedad en cuanto a: forma, coloración, aspecto exterior y desarrollo. No deben tener defectos, salvo defectos superficiales muy leves, siempre que no afecten el aspecto general del producto, su calidad, estado de conservación y presentación en el envase”.

“Además, deben tener la pulpa firme, sana y un 25 % de las unidades podrán no tener el pedúnculo siempre y cuando el corte sea limpio y la piel adyacente no esté dañada.”

[Text in English must be:]

“Apples of this class must be of superior quality. They must be characteristic of the variety regarding shape, colouring, external appearance and development. They must be free of defects with the exception of very slight superficial defects, provided these do not affect the general appearance of the produce, the quality, the keeping quality and presentation in the package.”

“Furthermore, the flesh must be firm and sound. The stalk (stem) may be missing **in 25% of pieces**, provided the break is clean and the adjacent skin is not damaged. “

-Text in Spanish In section **2.2.2. CLASS I** should be changed as follows:

“Las manzanas en esta categoría deben ser de buena calidad y deberán tener las características de la variedad. La pulpa deberá estar sana.

Se permitirán defectos leves, siempre que no afecten la apariencia general de la fruta, su calidad, su estado de conservación y presentación en el envase:”

“Apples of this class must be of good quality. They must be characteristic of the variety **and with sound flesh**.

The following slight defects, however, may be allowed, provided these do not affect the general appearance of the produce, the quality, the keeping quality and presentation in the package.”

- A slight defect in shape and development.

- a slight defect in colouring.

- a slight defect in the skin, **less than ONE (1) cm² of cumulative area.**

- **TWO (2) cm in length for defects of elongate shape.**

- **ONE (1) cm² of total surface area for other defects, with the exception of scab *Venturia inaequalis* (Cooke) Winter which must not extend over more than 0,25 cm². cumulative in area**

- **slight superficial defects not exceeding ONE (1) cm² in area and not discoloured .**

- **damage for hail (deformation or scarred wound due to hail). It should be a defect when produce had up TWO (2) wounds, or if it had an area of no more than FIVE (5) millimetres in diameter per wound.**

Furthermore, the flesh must be firm and sound. The stalk (stem) may be missing **in 25% of pieces**, provided the break is clean and the adjacent skin is not damaged.

- The text in Section **2.2.3. CLASS II** should be changed by the following text:

“This class includes apples which do not quality for inclusion in the higher classes, satisfy the minimum requirements specified in Section 2.1 above.

The flesh must be practically free of defects.

The following defects, however, may be allowed provided that the apples retain their essential characteristics as regards the quality, the keeping quality and presentation :

- defects in shape;

- defects in development;

- defects in colouring;

- **skin defects which must not be extended:**

- **over more than FOUR (4) cm in length for defects of elongated shape.**

- **over more than 2,5 cm² of the total surface area for other defects, with the exception of scab *Venturia inaequalis* (Cooke) Winter which must not extend over more than ONE (1) cm² cumulative in area. Slight superficial defects not exceeding 1,5 cm² in area which may be slighted discoloured.**

- **more than TWO (2) wounds, if it had an area of no more than FIVE (5) millimetres in diameter per wound because of hail.**

“**Furthermore, the flesh must be firm and sound.** The stalk (stem) may be missing **in 25% of pieces**, provided the break is clean and the adjacent skin is not damaged. “

- In section **3. PROVISIONS CONCERNING SIZING:** due to the technological progress for sizing of this produce, it is suggested to replace the established information in this point by the following:

“Size is determined by maximum diameter of the equatorial section or by weight.”.

The minimum size required is as follows:

Large-fruited Varieties	60 mm
Other varieties	50 mm

To ensure there is uniformity of size, the difference in diameter between the larger and the smaller fruit in the same package shall be limited to:

-5 mm for all fruit classes packed in regular layers.

-10 mm for all fruit classes packed in bulk.

- Section **4- PROVISIONS CONCERNING TOLERANCES.** This paragraph should be replaced by the following text:

“Tolerances in respect of quality and size shall be allowed in each package for produce not satisfying the requirements of quality and class indicated below.”

- In the **Quality Tolerances** clause the phrase "... or, exceptionally, coming within the tolerances of that class" should be removed. In the second paragraph of Class I referred to internal breakdown it is considered 2% instead of 1%. In the second paragraph of Class II the clause "very slight traces of internal breakdown should be removed from the list, and should be added 3% of decay, in such way as the paragraph should be edited as follows:

"Ten percent by number or weight of apples satisfying neither the requirements of the class nor the minimum requirements, with the exception of produce affected by rotting, **serious bruising** or any other deterioration rendering it unfit for consumption.

Included therein shall be allowed not more than 3% for apples affected by decay.

Within this tolerance, a maximum of 5% by number or weight of fruit is allowed which may show the following defects:

- serious attacks of cork (bitter pit) or water-core ;
- slight damage or healed cracks;
- presence of internal feeding pests and/or damage to the flesh caused by pests

-In Section **5-PROVISIONS CONCERNING PRESENTATION**, clause **5.1. UNIFORMITY** in the first paragraph should be incorporate the following words: "variety", "degree of ripeness" and remove "... and may be of mixed varieties." The second paragraph should comprise only the sentence "For Extra class, colour should be uniform" and the next sentence should be included in paragraph three. From this paragraph should be removed "and/or size" and the sentence "en los relativo a la variedad" (in Spanish) should be changed by "between varieties" (in English).

- In clause 5.2 **PACKAGING** it is suitable to take in account the following order and editing:

"Apples must be packed in such way as to protect the produce properly.

Apples shall be packed in each container in compliance with the Recommended International Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables"

5.2.2. Description of Containers

The containers must ensure a suitable protection of the produce . The containers intended for direct sale to the consumer must be sufficiently rigid to ensure a proper protection of the produce.

The materials used inside the package must be new, clean, and of a quality such as to avoid causing any external or internal damage to the produce. The use of materials, particularly of paper or stamps bearing trade specifications is allowed, provided the printing or labelling has been done with non-toxic ink or glue.

Stickers individually affixed on the produce shall be such that, when removed, they neither leave visible traces of glue.

The containers must be free of all foreign matter.

In Section **6-MARKING OR LABELLING** , clause **6.2 NATURE OF PRODUCE** we believe that even though the produce is visible from the outside, it is important to include the following information:

- Name of the specie
- Name of variety.
- In the case of consumer packages containing a mixture of apples of different varieties, names of the different varieties;

- Change the number 5 in clause **CONTAMINANTS** by number 7.

-Remove **ANNEX II**

-As to colour, russeting and listing of varieties the following considerations are given:

1) COLOUR OF APPLES:

The apple varieties shall be classified according to their group and colour:

Color group	A	B	C
	Varieties with red colouring: Red colouring characteristic of variety covering at least:	Varieties with mixed red colouring: Red colouring characteristic of variety covering at least:	Varieties with stripes and slight red colouring: Red colouring characteristic of variety covering at least:
Class "Extra"	3/4	1/2	1/3
Class I	1/2	1/3	1/10
Class II	1/4	1/10	-

2) APPLE CRITERIA FOR RUSSETING:

The apple varieties shall be classified into two groups according to their russeting.

Group R: Varieties for which russeting is a characteristic of the skin, the russeting is not a defect if it corresponds to the typical appearance of the variety.

For the rest of varieties the russeting is allowed within the following limits:

	Extra	I	II	Tolerances for Class II
(i) Brown patches	not outside the stem cavity	may go slightly beyond the stem or pistil cavities	may go beyond the stem or pistil cavities	fruit not seriously detracting from the appearance and condition of the package
	not rough	not rough	slightly rough	
(ii) Russeting		Maximum surface area of the fruit permitted		
thin net-like russeting (not contrasting strongly with the general colouring of the fruit)	slight and isolated traces of russeting not altering the general appearance of the fruit or of the package	1/5	1/2	Fruit not seriously detracting from the appearance and condition of the package
Heavy	None	1/20	1/3	fruit not seriously detracting from the appearance and condition of the package
Both type of defects (with the exception of brown patches which are excluded from these cumulative defects)				fruit not seriously detracting from the appearance and condition of the package
In no case may thin russeting and heavy russeting taken together exceed a maximum of:		1/5	1/2	

AUSTRALIA

General Comments

Australia believes the Codex Standard for Apples should only be concerned with ensuring that the product is clean, safe, and fit for human consumption; and should not relate to quality parameters (such as sizing, maturity requirements) that are a commercial standard set by the marketplace.

Of particular note, Australia considers sizing should not be included in the standard (as is currently the case) because it does not allow for niche markets of small size apples or for very large size apples. Australia has found that reference to prescriptive sizing requirements restricts innovation and presents a trade barrier.

Australia has a strong objection to the existence of varietal lists (Annexes I and III) and believes that they should be removed. Australia's objections to the lists are as follows:

- The purpose of the lists is not clear. Are they an official approved list of varieties, an exhaustive list or a non-exhaustive list?
- The lists appear to be non-exhaustive and there are no clear criteria for how varieties have been included in the list; and how additional varieties will be included in the lists in future.
- There is no mention of a mechanism to maintain and update the list in a timely manner.
- There is no statement about what the consequences are for varieties that do not appear in a list.
- Inconsistencies are going to arise in the variety listings with varietal mutations. For instance, Cripps Pink is listed under *Group C – Varieties with stripes and slight red colouring*. However a mutation of Cripps Pink (known as Rosy Glow) is almost a full red and is unlikely to fit in this category. These inconsistencies are also going to arise with trademarked varieties.
- Trademarks are not varieties and should not appear in the list (as is currently the case).
- The lists are not currently referred to anywhere in the main body of the Draft Standard and if their purpose is in relation to the Quality Standards (Section 5.1), they should be referred to in Section 5.1.

If these lists are to be incorporated into the Standard, Australia believes that reference should be made to the fact it is a non-exhaustive list, as per the UN-ECE standard. Without such a reference, the lists have in-built obsolescence. Australia proposes that the following wording, as a minimum, should be included:

“Fruits of varieties that are not part of the list must be graded according to their varietal characteristics.”

Specific Comments

Section 2.1 Minimum Requirements

Australia considers that the final dash point “free of internal water core” is not appropriate as a comprehensive provision, since water core is a requirement for certain varieties. Although Annex II refers to this requirement in the reference to Fuji and Jonathon varieties (in the second dot point), Australia considers it should be made more explicit in the body of the document. This is because in some varieties it is not regarded as a defect, but an essential market requirement and can lead to rejections of fruit on the basis of insufficient water core. Australia proposes replacing the respective texts as follows:

In Section 2.1.1

“Except in varieties where it is a market requirement, apples must be free of water core”

In Annex II

“Internal water core shall not be considered at any time of the year as a quality factor in varieties where water core is a market requirement. “

2.1.2 Maturity Requirements

Footnote 3

“Maturity Indicators are currently being developed by the UN/ECE Specialized Session on Standardization of Fresh Fruit and Vegetables.”

Australia considers that reference to the UN/ECE standards is not appropriate as these are under development and Codex standards are not contingent on these standards. UN/ECE standards may not be adopted by Codex as is, but rather may be used as a reference. As such, the footnote should be deleted.

Section 2.2 Classification

After “*Apples are classified in three classes defined below:*” introduce a footnote as follows:

“These classifications do not preclude mixed class consignments”

Australia considers that mixed consignments are frequently requested and supplied and should not be excluded by this standard.

Section 3. Provisions Concerning Sizing; Section 4.2 Size Tolerances

Section 3 and Section 4.2 are confusing and are difficult to interpret. There needs to be better reference as to whether the sizing refers to packages of apples or classes. Currently, they appear to be inconsistent. Australia would appreciate clarification of the two sections.

Section 7 Contaminants

Has been mislabelled Section 5

Section 7.1 Pesticide Residues

Add to the text: “..residue limits established by the Codex Alimentarius Commission **or as per national legislation....**”

Section 7.2 Other Contaminants

Add to the text: “..for contaminants established by the Codex Alimentarius Commission **or as per national legislation....**”

EUROPEAN COMMUNITY

General remark

The European Community would like to highlight the statement of paragraph 4 of document CX/FFV 05/12/4, in particular: “The Codex Alimentarius Commission has also stressed the need for the CCFFV to cooperate and coordinate with the UN/ECE ...by allowing the Commission to use UN/ECE standards as a base for developing Codex standards...”. Some parts of the proposed draft codex standard for apples in document CX/FFV 05/12/8 varies from the UN/ECE standard for apples with no clear justification (e.g. introduction of separate variety lists). The European Community considers necessary the changes made to follow the draft codex standard layout, however if other changes are proposed by drafting group, reasons should be explained. The European Community considers that changes from UN/ECE standards should be justified and done according to discussions within the Codex Committee on Fresh Fruits and Vegetables.

The European Community is on the view that the UN/ECE standard on apples and the last amendments proposed at the 51st Session of the UN/ECE Specialized Section on Standardization of Fresh Fruits and Vegetables (Geneva, March 2005) should be used as a starting point for discussion of the standard on apples.

Minimum requirements (pt 2.1)

The European Community is of the view that the words “free of internal water core*.” should not be listed in the minimum requirement as tolerances are considered (footnote 2 and annex II).

Minimum requirements (pt 2.1.1)

The European Community is of the view that the words “and have reached ... to the area in which they are grown” should be deleted. The reference concerning maturity and ripeness should be made in 2.1.2.

Maturity requirements (pt 2.1.2)

The European Community considers that the amendment proposed at Geneva in March 2005 should be considered:

“2.1.2. Maturity Requirements

The apples must be sufficiently developed and display satisfactory ripeness.

The development and state of maturity of the apples must be such as to enable them to continue their ripening process and to reach the degree of ripeness required in relation to the varietal characteristics.

In order to verify the minimum maturity requirements, several parameters can be considered (e.g.: morphological aspect, taste, firmness and refractometric index) [and, if refractometric index of the flesh is measured, the Brix degree must be greater than or equal to x°.]“

The European Community proposes to discuss an appropriate limiting refractometric index.

Classification and allowance for defects (pt 2.2 and annex II.)

The European Community is of the view that the distinction between the defects presented in annex II creates too much complexity and should be simplified.

Provisions Concerning Sizing (pt. 3)

The European Community considers that minimum size should be required and that the uniformity provisions are not appropriate. The following provisions should be included:

“3. Provisions concerning sizing

Size is determined by maximum diameter of the equatorial section or by weight.

When size is determined by diameter the minimum diameter required for each class is as follows:

	<i>Extra</i>	<i>Class I</i>	<i>Class II</i>
<i>Large fruited varieties</i>	<i>65 mm</i>	<i>60 mm</i>	<i>60 mm</i>
<i>Other varieties</i>	<i>60 mm</i>	<i>55 mm</i>	<i>50 mm</i>

When size is determined by weight the minimum weight required for each class is as follows:

	<i>Extra</i>	<i>Class I</i>	<i>Class II</i>
<i>Large fruited varieties</i>	<i>110g</i>	<i>90g</i>	<i>90g</i>
<i>Other varieties</i>	<i>90g</i>	<i>80g</i>	<i>70g</i>

To ensure there is uniformity of size:

For fruit sized according to the diameter, the difference in diameter between fruit in the same package shall be limited to:

5 mm for "Extra" Class fruit and for Class I and II fruit packed in rows and layers

10 mm for Class I fruit packed loose in the package or in consumer packages.

For fruit sized according to weight, the difference in weight between fruit in the same package shall be limited to:

20% of the average individual fruit weight in the package for Class Extra and for Class I and II fruit packed in rows and layers

25% of the average individual fruit weight in the package for Class I fruit packed loose in the package or in consumer packages.

There is no sizing uniformity limit for Class II fruit packed loose in the package or in consumer packages."

Provisions concerning tolerances (pt 4.)

The European Community considers that provisions concerning tolerances should be limited to the following:

"4. Provisions concerning tolerances

Tolerances in respect of quality and size shall be allowed in each package for produce not satisfying the requirements of the class indicated.

4.1. Quality tolerances

4.1.1 "Extra" Class

5 per cent by number or weight of apples not satisfying the requirements of the class, but meeting those of Class I or, exceptionally, coming within the tolerances of that class.

4.1.2 Class I

10 per cent by number or weight of apples not satisfying the requirements of the class, but meeting those of Class II or, exceptionally, coming within the tolerances of that class.

4.1.3 Class II

10 per cent by number or weight of apples satisfying neither the requirements of the class nor the minimum requirements, with the exception of produce affected by rotting or any other deterioration rendering it unfit for consumption.

Within this tolerance, a maximum of 2 per cent by number or weight of fruit is allowed which shows the following defects:

serious attacks of cork (bitter pit) or water core

slight damage or unhealed cracks

very slight traces of rot

presence of internal feeding pests and/or damage to the flesh caused by pests.

4.2 Size tolerances

For all classes:

(a) for fruit which is subject to the rules of uniformity, 10 per cent by number or weight of fruit corresponding to the size immediately above or below that marked on the package, a maximum variation of 5 mm or 10 g is allowed below the minimum

(b) for fruit which is not subject to the rules of uniformity, 10 per cent by number or weight of fruit below the minimum size laid down, with a maximum variation of 5 mm or 10 g below the minimum.”

Provisions concerning presentation (pt 5.3)

The European Community considers that the presentation of “extra” class fruits must be defined.

“5.3 Presentation

“Extra” Class fruits must be packed in layers.”

Provisions concerning marking or labelling (pt 6)

Considering the large number of varieties and the difference between them, the European Community is of the view that variety name should be mentioned also on the consumers packages.

“6.1.1 Nature of produce

If the produce is not visible from the outside, each package, or lot for produce presented in bulk, shall be labelled as to the name of the produce. Each package must be labelled as to name of the variety, class and size/weight or the number of pieces presented in rows and layer.”

The European Community is of the view that requirements regarding marking of non-retail container should be clarified in particular for mixed packages.

“6.2.2 Nature of the produce

“Apples”, if the contents are not visible from the outside. Name of the variety, In the case of consumer packages containing a mixture of apples of different varieties, names of the different varieties.

6.2.3 Origin of produce

Country of origin and, optionally, district where grown, or national, regional or local place name.

In the case of consumer packages containing a mixture of varieties of apples of different origins, the indication of each country of origin shall appear next to the name of the variety concerned.

6.2.4 Commercial specifications

Class

Size, or for fruit packed in rows and layers, number of units.

If identification is by the size, this should be expressed:

(a) for produce subject to the uniformity rules, as minimum and maximum diameters or minimum and maximum weight;

(b) for produce not subject to the uniformity rules, the diameter or weight of the smallest fruit in the package followed by ‘and over’ or equivalent denomination or, if appropriate the diameter or weight of the largest fruit in the package.”

Annexes

The European Community considers that the 5 lists in the annex of the proposed draft codex standard for apples should be replaced by a unique list with different columns as presented below. This list should be limited to the main marketed varieties.

“ANNEX**1. Colouring Criteria for Apples, Colour Groups and Codes**

<i>Colour group</i>	<i>A</i>	<i>B</i>	<i>C</i>
	<i>total surface area of red colouring characteristic of the variety</i>	<i>total surface area of mixed red colouring characteristic of the variety</i>	<i>total surface area of slightly red coloured, blushed or striped characteristic of the variety</i>
<i>Class Extra</i>	<i>3/4</i>	<i>1/2</i>	<i>1/3</i>
<i>Class I</i>	<i>1/2</i>	<i>1/3</i>	<i>1/10</i>
<i>Class II</i>	<i>1/4</i>	<i>1/10</i>	<i>–</i>

2. Russeting Criteria for Apples

R = Variety for which russeting is a characteristic of the skin and is not a defect if it corresponds to the typical appearance of the variety.

For varieties not marked with an “R” in the list below, russeting is allowed within the following limits

	<i>Extra</i>	<i>I</i>	<i>II</i>	<i>Tolerances for Class II</i>
(i) Brown patches	<i>not outside the stem cavity</i>	<i>may go slightly beyond the stem or pistil cavities</i>	<i>may go beyond the stem or pistil cavities</i>	<i>fruit not seriously detracting from the appearance and condition of the package</i>
	<i>Not rough</i>	<i>not rough</i>	<i>slightly rough</i>	
(ii) Russeting		<i>Maximum surface area of the fruit permitted</i>		
thin net-like russeting <i>(not contrasting strongly with the general colouring of the fruit)</i>	<i>slight and isolated traces of russeting not altering the general appearance of the fruit or of the package</i>	<i>1/5</i>	<i>1/2</i>	<i>fruit not seriously detracting from the appearance and condition of the package</i>
Heavy	<i>None</i>	<i>1/20</i>	<i>1/3</i>	<i>fruit not seriously detracting from the appearance and condition of the package</i>
Cumulative defects <i>(with the exception of brown patches which are excluded from these cumulative defects)</i> <i>In no case may thin russeting and heavy russeting taken together exceed a maximum of:</i>		<i>1/5</i>	<i>1/2</i>	<i>fruit not seriously detracting from the appearance and condition of the package</i>

3. *Size Criteria for Apples*

L = Large fruited variety

*Non-Exhaustive List of Apple Varieties**

** Fruits of varieties that are not part of the list must be graded according to their varietal characteristics. Coloured and/or large fruited varieties as well as those showing a characteristic russetting should be included in the list to provide information about the varietal characteristics.*

<i>Variety/</i>	<i>Synonyms/</i>	<i>Colour group/</i>	<i>Russetting/</i>	<i>Size/</i>
	<i>If any</i>	<i>A, B or C</i>	<i>R or nothing</i>	<i>L or nothing</i>

NEW ZEALAND

Criteria should be minimal, no more restrictive than necessary in terms of fair trade, and should not inhibit product development and innovation. The standards should also allow for regional and seasonal production variations in the essential quality characteristics and variations in regional marketing expectations.

Provisions concerning sizing

Clauses on sizing should only be included in standards when they can be scientifically justified on the basis of protecting consumer health or ensuring fair trade practices. New Zealand only supports the introduction of sizing clauses from existing standards where the Codex twin principles can be scientifically justified.

Varietal colour

New Zealand is concerned that clauses that attempt to establish colour profiles for specific varieties remove the possibility of commercial innovation. Provided the produce is fit for consumption, mature, and meets the general tests for quality and consistency then colour should not be considered as either an issue of consumer health or fair trade.

Specific Comments

1. Annex I, list of varieties

New Zealand questions the relevance of varietal lists except as a non-exhaustive reference for labelling purposes. With the removal of any specific varietal sizing clauses and the pending introduction of maturity parameters the varietal lists should be included only as a reference for labelling.

Given the complexity of apple standards generally it would be useful to have a consistent format between this list and other lists in international standards such as the UNECE Standard for Apples.

To avoid confusion in trade, there should be just one list of varieties internationally. New Zealand suggests that a joint UNECE/Codex list should be considered.

UNECE & Codex together should determine the ongoing administration needed to maintain the list. An example of how this could be done is that the administration could be kept in the UNECE forum, Codex adopts the current list. UNECE advises Codex of any subsequent changes made to the list. Codex considers changes and decides whether to adopt the amended list or not.

2 1. DEFINITION OF PRODUCE

New Zealand does not support the inclusion of footnote ¹ : (“Governments, when indicating the acceptance of the Codex Standard for Apples, should notify the Commission which provisions of the Standard would be accepted for application at the point of import, and which provisions would be accepted for application at the point of export.”)

New Zealand believes this is unnecessary, and overly administrative.

3 2.1 MINIMUM REQUIREMENTS

New Zealand generally supports harmonisation with the UNECE standard including the clauses on classification and the layout of the UNECE standard where defect allowances form part of the description of a Class, rather than inclusion as appendices, as in this draft Codex Apple Standard.

8th bullet point, “free of internal water core”,

New Zealand does not support the inclusion of wording that specifically excludes water core. Water core is only a problem if it leads to internal breakdown. Internal breakdown is covered by the 2nd bullet point in this section. Water core is a characteristic of some varieties and some customers seek apple varieties with high water core. This point should therefore be deleted as it is superfluous. This means that Footnote 2 should also be deleted along with the criteria on water core in Annex II.

4 2.1.2 MATURITY REQUIREMENTS

New Zealand believes maturity requirements can be scientifically justified provided the maturity parameters are based on minimum standards of “fit for purpose”. Maturity parameters should also be commercially relevant and be recognised commercial processes for determining maturity.

As maturity parameters are often only determined through destructive measures New Zealand supports measures to ensure inspector sampling is only carried out when visual signs exist that indicate immaturity.

Standards should only attempt to address under-maturity. Issues of over-maturity are able to be addressed through general clauses on quality, e.g. “.produce affected by rotting or deterioration such as to make it unfit for human consumption is excluded”.

Codex Standards should recognise that maturity parameters differ regionally and complex issues such as regional differences in storage and shipping times may significantly affect the parameters that can be used within a global standard. Southern Hemisphere produce harvested, stored and shipped for the Northern Hemisphere markets may be harvested at brix levels well below final marketed brix levels.

It is not clear what is meant by “...stage of ripeness required in relation to the varietal characteristics”.

Section 2.1.2 should therefore be re-written as follows:

“Apples must be at a stage of development that enables them to continue the ripening process”.

Footnote 3 could remain.

5. 3 PROVISIONS CONCERNING SIZING

New Zealand supports the provisions as written in the first sentence and welcomes the exclusion of specific minimum sizes. We believe there is no justification on the basis of human health or fair trade for minimum sizes to be included in a global standard.

In regard to the uniformity provisions we note the wider tolerances to those in the UNECE Standard. New Zealand does not regard the tolerances within the UNECE apple standard as unduly restrictive, but is willing to consider wider size tolerances within the Codex Standard.

6. **4 QUALITY TOLERANCES**

New Zealand supports harmonisation with the UNECE standard for tolerances

7. **5 PROVISIONS CONCERNING PRESENTATION**

5.1 UNIFORMITY

New Zealand supports harmonisation with the UNECE standard.

5.2 PACKAGING

The wording in the draft Codex standard is supported by New Zealand. It effectively addresses, through footnote 6, the possible use of recycled packaging and also links the packaging standard to an existing international standard.

5.3 PRESENTATION

The draft Codex wording on presentation simply lists all possible packing options as being acceptable and New Zealand questions whether this approach adds to the standard. On the other hand the UNECE standard is quite prescriptive in requiring a particular class to be packaged in a predetermined manner. Perhaps it is time to remove any reference to packaging type.

8 **6. MARKING OR LABELLING**

New Zealand supports harmonisation with the UNECE standard but understands the importance of reference to other Codex Standards where appropriate,

FOOTNOTE 7

Question the need for statement requiring conformance to national requirements – this is up to individual countries.

IRAN

Please find Iran comments on CX/FFV 05/12/8 as follow:

- 1- For apples of extra class (2.2.1, page 4) and class I (2.2.2, page 4), Iran suggests that percentage of missing stalk (stem) be specified.
- 2- In annex I , page 8 under the table of “ varieties with red coloring “ , please note that fifth item of left column is miss-spelled (JONAGORED)and should be corrected to “JONAGOLD”
- 3- Iranian varieties of apples according to following tables to be included in annex I , page 8,9,10, 11.

GROUP A : VARIETIES WITH RED COLORING
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GHARA YAPRAGH

SHAKKI AHAR

AROOS MESHKINSHAHR

KHAN ALMASY

ABBASI MASHHAD

ARANGEH

NAR SIBE MASHHAD

GROUP B: VARIETIES WITH SEMI-RED OR MIXED COLORING

KHORSIGAN

SHAFIE ABADI

SHAYKH AHMAD TABRIZ

MORABAE MASHHAD

ZONOUZ MARAND

SHEMIRANI

RED REZAEYEH

AROOS MESHKINSHAHR

ABBASI MASHHAD

GOLSHAHI

DARYAN

MASHHADI NOURI MARAGHEH

GROUP C: VARIETIES WITH STRIPES AND SLIGHT RED COLORING

GOLAB KOHANZ

GOLAB KERMANSHAH (SAHNEH)

GOLAB GHANDAK KASHAN

GROUP D: GREEN AND YELLOW VARIETIES

BOSHGHABI BALKHI

AKHLAMAD MASHHAD

MASHHADI NOURI MARAGHEH

ARANGEH

VENEZUELA

Venezuela believes that this Project should be improved because there are essential points where the necessary considerations that define a Codex Standard have not been taken in account, nor standards to which members countries are based on, as follows:

- 1. In order to be a quality produce it is necessary that produce be free of contaminants, adulterants, toxins, foreign matter, and any other substance unfit for human consumption or having minimum acceptable levels . Furthermore, the quality characteristics include the nutritional value, organoleptic and functional properties.*
2. Codex Standards and practice codes have been developed in order to allow that produces which fulfil this standards are free commercialized in the international market without danger for customers health and interests.

3. Diseases transmitted through foods (ETA for its acronym in Spanish) comprise an enlarged and growing problem of public health in the World. These mostly affect children, pregnant women and older people.

In this draft it is noted the flexibility of some points that we estimate are very important because they define or establish the quality and safety of fruit. Quality of a fruit according to the Covenin Standard 1834:81 from Venezuela is a group of characteristics (external and internal) that establishes the grade of acceptability of fruits based on quality.

Quality Requirements (according to the Covenin Standard 1834:81 from Venezuela): group of attributes determining the classification of the fruit based on quality.

Sound Fruit (according to the Covenin Standard 1834:81 from Venezuela): it is the fruit free of biological agents (such as insects, rodents, etc.) and/or physical agents (such as heat, cool, etc.); and/or chemical agents (pesticides, fungicides, etc.); and/or other physiological factors (internal alterations of fruit).

In this context, Venezuela believes that the following points should be changed:

2.1 MINIMUM REQUIREMENTS

In all classes, subject to the special provisions for each class and the tolerances allowed, the apples must be:

- Whole;
- Sound, produce affected by rotting or deterioration such as to make it unfit for **human** consumption is excluded.
- **Clean, ~~practically~~ free of any visible foreign matter;**
- **~~Practically~~-Free of pests affecting the general appearance of the produce;**
- Free of abnormal external moisture
- Free of internal water core.

2.2. CLASSIFICATION

“EXTRA” CLASS:

It should be more demanding. **They must be free of defects provided these do not affect their organoleptic characteristics, the quality, the keeping quality and presentation in the package.**

2.2.2. Class I

2.2.3. Class II.

About these two classes, there is not any difference because the displayed requirements are the same. These requirements must be more specific for each class (I and II), besides considering the defects proposed by the CEPE Standards for Apples (**Standard FFV-50**).

4. PROVISIONS CONCERNING TOLERANCES

Review the size because it indicates that for tolerances of 10% or more, individual package shall contain not more than one and one-half times (150%) the tolerance specified. For tolerances of less than 10%, individual packages shall contain not more than double the tolerance(s) (300%) specified.

4.1 QUALITY TOLERANCES.

About classes I, II and “Extra”, it is necessary to look for the equivalence between number and weight so that exists uniformity with the used terms.

Remove the presence of defects specially in “Extra” Class where it is supposed it fulfills all parameters requested in the draft Codex Standard.

Class II do not ensure the quality of produce and its safety characteristics because it accepts damages resulting from unhealed broken skin/cracks as well as the presence of internal feeding pests (larvae or plagues) or damage to the flesh caused by pests without taking in account the identification of the allowed and suitable quantity of pests; if they must be really considered as quality tolerances; or establishing that they are a microbiological hazard which affect the population health, and as a consequence, the possible presence of Diseases transmitted through foods (ETA for its acronym in Spanish). Therefore, it does not comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL-21-1997) (point 8.2).

5. PROVISIONS CONCERNING PRESENTATION

5.1-Uniformity

There is not difference between the content of the lot and the content of the package. Furthermore, uniformity in variety must be required, that is to say, apples must be of the same variety, colour, in the same container, etc., so they are really uniform.

5.2 PACKAGING

5.2.1 DESCRIPTION OF CONTAINERS

The containers shall be of **non-toxic** materials in order to satisfy the quality characteristics....

6.MARKING OR LABELLING

6.1.1 NATURE OF PRODUCE

If the produce is not visible from the outside, each package, or lot for produce presented in bulk, shall be labelled as to the name of the produce, and may be named as to name of the variety, class, size/.....

6.2 NON-RETAIL CONTAINERS

6.2.1 IDENTIFICATION

Name and address of exporter, packer and/or dispatcher. **IDENTIFICATION CODE mandatory in order to execute the planes of traceability of produce.**

6.2.2 NATURE OF PRODUCE

Name of the produce if the contents are not visible from the outside. and Name of variety or varieties (where appropriate)

6.2.3 ORIGIN OF PRODUCE

country of origin and, optionally, district where grown, regional or local place name.

6.2.4 COMMERCIAL IDENTIFICATION

According to class and size.

6.2.5 OFFICIAL INSPECTION MARK (We do not know what it refers to)

7. CONTAMINANTS

7.1 PESTICIDE RESIDUES

Apples must not exceed ~~shall comply with~~ those maximum pesticide residue limits established by the Codex Alimentarius Commission for this commodity.

7.2 OTROS CONTAMINANTES

Apples must not exceed ~~shall comply with~~ those maximum pesticide residue limits established by the Codex Alimentarius Commission for this commodity.