



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.net

Agenda Item 4(b)

CX/FFV 11/16/8 Add.1
April 2011

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES**

**16th Session
Mexico City, Mexico, 2 – 6 May 2011**

Comments submitted in response to the Proposed Draft Standard for Pomegranate by:
Colombia, Costa Rica, India, European Union and Thailand

COLOMBIA

I. DEFINITION OF PRODUCE

Review the family of the taxonomic class; Punicaceae corresponds to a sub-family of the Lythraceae family.

II. Section 2.1 MINIMUM REQUIREMENTS

Take out the fifth bullet due to its content is included before as “free of pests and damage caused by them (...)”.

III. Section 2.1 MINIMUM REQUIREMENTS

Take out the term “frost” from the eighth bullet, due to the frosting damages are included in those caused by the low temperatures..

The proposed text is “free of damage caused by low and or high temperatures”;

IV. Section 2.1.1

Include after “been picked” the term “carefully”, according to the Codex template. Furthermore, it is important to point the importance of carrying out a careful collection that does not affect the quality and innocuousness of the produce.

V. Section 2.1.1

Add the requirements of ripeness for the pomegranate to be commercialized. It may be seen that the external color of the pomegranate is variable from a clear green to an intense red. If this is not the case, it may be suggested applying a statistical sampling and determining the °Brix of the fruit.

VI. Annex

Fruits with some degree of decay should not be included due to this condition is caused by fungi or bacteria, which is not based on the NIMF, as well as becoming a source of unhealthiness and disease transmission/pest to other fruits.

VII. Annex

Unripeness Fruits should not be allowed due to they do not comply the requirements established in the standard and, they should not comply with the uniformity criteria.

VIII. Annex

Fermented Fruits should not be allowed. Fermentation is caused by bacteria that are able to spread to other fruits, so fermented fruits that are able to spread bacteria into the package are not allowed.

IX. Annex

Eiminate the possibility of finding foreign matter, which is not allowed in Section 2.1.1 Minimum Requirements of the standard.

X. Annex

Properly express the percentage of defects such as: total of defects, (%): ≤ 6 ; ≤ 9 ; ≤ 13 . As a mathematics and reading rule.

XI. Section 3. PROVISIONS CONCERNING SIZING

Include the table of sizings. According to the morpho-physiological characterization, it is possible to build a table of sizing.

XII. Section 5.1 UNIFORMITY

The word "Cultivar" should be eliminated due to it is referred to the farming of plants of a unique variety.

Sizing is one of the ways in which uniformity is ensured by weight or diameter of the produce in the market fruits.

Moreover, the included text does not match with the template of Codex and it is inconsistent with the uniformity section established in the draft standard.

The suggested text is: "The contents of each package shall be uniform and contain only pomegranate of the same origin, cultivars and/or commercial type, quality and size. The visible part of the contents of the package must be representative of the entire contents."

XIII. Numeral 5.2 Packaging

In the footnote 1, change food-grade quality by "food grade", or "sanitary quality". This is due to the food quality is understood as the condition or characteristics of a food to be considered as it. Also, it is referred to the inserts used in the packages, which should be of sanitary quality so they avoid the contamination with food. Also, when inserts can be consumed together with the produce, it is known that is made of a material of "food grade". Although the term considered in the footnote is a Codex template, it is not correct to be used.

COSTA RICA

Costa Rica welcomes the opportunity to support the "Proposed Draft Standard for Pomegranate".

EUROPEAN UNION

The European Union and its Member States (EUMS) would like to thank Iran for leading the work on developing the standard for pomegranate. The EUMS wish to make the following comments to the proposed draft standard.

2.1 Minimum requirements

Delete the fifth indent "free of dead insects, insect fragments and pest excrement visible to the naked eye".

Rationale: The provision in the fifth indent is covered by the third indent "clean, free of any visible foreign matter".

Delete the ninth indent "free of cracking".

Rationale: The provision of the ninth indent is covered by the first indent "whole".

Add a new indent "free of sun burns".

Rationale: This is a defect which causes decolourisation of the grains below the area of damaged skin.

2.1.1, 2.2.1 and 2.2.2

Delete the words "and/or cultivar".

Rationale: From section 1 it is clear that "cultivar" is used as a synonym for "variety".

3. Provisions concerning sizing

Modify the text as follows:

Size is determined by measuring the maximum diameter of the equatorial section of the fruit or by the weight of each fruit. ~~The average size (weight or diameter) of fruit in the lot shall be declared on the label or non-retail container.~~

Rationale: Sections 6.1.1 and 6.2.4 provide for labelling of sizing (if sized) on consumer packages and non-retail containers. Thus the second sentence is redundant.

It would be preferable to add provisions on minimum and maximum sizes and size ranges to ensure uniformity in size, possibly in the form of a table.

4. Provisions concerning tolerances

Modify the first paragraph as follows:

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

Rationale: It is more appropriate to direct the provisions on tolerances to a lot than a package.

Modify sections 4.1.1, 4.1.2 and 4.1.3 as follows:

4.1.1 "Extra" class

A total tolerance of five percent by number or weight of pomegranates not satisfying the requirements of the class, but meeting those of Class I is allowed. Within this tolerance not more than 0.5 per cent in total may consist of produce satisfying the requirements of Class II quality or, exceptionally, coming within the tolerances of that class.

4.1.2 Class II

A total tolerance of ten percent, by number or weight of pomegranates not satisfying the requirements of the class is allowed, but meeting those of Class II, or exceptionally, coming within the tolerances of that class. Within this tolerance not more than 1 per cent in total may consist of produce satisfying neither the requirements of Class II quality nor the minimum requirements, or of produce affected by decay.

4.1.3 Class II

A total tolerance of ten percent, by number or weight, of pomegranates satisfying neither the requirements of the class nor the minimum requirements is allowed, with the exception of produce affected by rotting or any other deterioration rendering it unfit for consumption. Within this tolerance not more than 2 per cent in total may consist of produce affected by decay.

Rationale: The proposed new texts better define the tolerances in different classes.

5.1 Uniformity

Modify the text as follows:

"The contents of each package must be uniform and contain only pomegranates of the same origin, variety ~~or cultivar~~, and quality and size (if sized). Sales packages may contain mixtures of distinctly different varieties and sizes provided they are uniform in quality and for each variety concerned, from the same origin. The visible part of the contents of the package must be representative of the entire contents."

Rationale: The words "or cultivar" should be deleted as the term "cultivar" is used as a synonym for "variety". Mixtures of varieties can be accepted only if these varieties are distinctly different.

5.2 Packaging

Add a new paragraph after the first paragraph:

Stickers individually affixed to the produce shall be such that, when removed, they neither leave visible traces of glue nor lead to skin defects.

Rationale: Stickers on individual fruits are commonly used and therefore there should be provisions ensuring that they do not cause defects.

6.1.1 Nature of Produce

Modify the text as follows:

"If the produce is not visible from the outside, each package shall be labelled as to the name of the produce and may be labelled as to name of the variety ~~and/or cultivar~~, class, size code (if used) and size/weight or the number of pieces presented in rows and layers."

Rationale: The words "and/or cultivar" should be deleted as the term "cultivar" is used as a synonym for "variety".

6.2.1 Identification

Modify the text as follows:

"Name and physical address (e.g. street/city/region/postal code and, if different from the country of origin, the country) of exporter, packer and/or dispatcher. Identification code officially recognised by the national authority (optional)."

Modify footnote 1 as follows:

The national legislation of a number of countries requires the explicit declaration of the name and address. However, in the case where a code mark is used, the reference "packer and/or dispatcher (or equivalent abbreviations)" has to be indicated in close connection with the code mark and the code mark should be preceded by the ISO 3166 (alpha) country/area code of the recognizing country, if not the country of origin.

Rationale: The proposed new texts provide useful clarifications to the provisions.

6.2.2 Nature of the produce

Modify the text as follows:

Name of the produce if the contents are not visible from the outside. Name of the variety ~~or cultivar~~ (where appropriate optional).

Rationale: The words “or cultivar” should be deleted as the term “cultivar” is used as a synonym for “variety”. The term “optional” is normally used in Codex standards for optional provisions instead of the term “where appropriate”.

6.2.4 Commercial identification

Delete the second indent “Size (if sized)”

Rationale: The standard does not provide any provisions on size. Delete the fourth indent “if appropriate, indicate the use of preservatives”.

Rationale: The term “preservatives” refers to food additives and their use in fresh fruits should not be allowed. Chemical substances used for surface treatments to preserve fresh fruits are covered by section 7.2.

Delete the fifth indent “Any other marking required by the purchaser”

Rationale: A purchaser is free to choose any marking s/he wants and therefore it is not appropriate to have this provision in the standard. It does not exist in any other Codex standard for fresh fruits and vegetables.

Annex

Delete the words “(see Annex)” in sections 2.2.1, 2.2.2, and 2.2.3.

Rationale: Sections 2.2.1, 2.2.2, and 2.2.3 provide the degree of various defects in individual pomegranates in different classes. The maximum allowance for defects indicated in the table in the Annex refer to percentages of damaged pomegranates in a lot and therefore relate to quality tolerances which are provided in sections 4.1.1, 4.1.2 and 4.1.3. Therefore, it is not correct to refer to the Annex in sections 2.2.1, 2.2.2, and 2.2.3.

Delete the Annex.

Rationale: The table in the Annex poses a number of problems:

- ✓ The maximum allowances for defects in the table are too high, in particular as regards spoiled fruits.
- ✓ The degree of extraneous matter should not depend on the classification.
- ✓ Packages containing extraneous matter affecting the general appearance are not allowed in any class.
- ✓ The maximum allowances for defects in the table contradict the quality tolerances provided in sections 4.1.1, 4.1.2 and 4.1.3.

Therefore, the Annex with the table should be deleted. The proposed new wording for sections 4.1.1, 4.1.2 and 4.1.3 provide sufficient clarity for tolerances and no separate table is needed for this purpose.

INDIA

SECTION 2: PROVISIONS CONCERNING QUALITY

SUB-SECTION 2.1: MINIMUM REQUIREMENTS

5th Bullet: It is proposed to delete the bullet stating, “free of dead insects, insects fragment and pest excrement visible to the naked eye;”

Rationale: The text states that pomegranate must be free from contaminants visible to the naked eye. This is an issue related to contamination of pomegranate with foreign matter, which is covered under the Section 7 of the standard containing information on Codex General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995). Hence it is not necessary to mention it under this sub-section. Moreover, the indent is a repetition of the fourth indent.

9th Bullet: The bullet may be modified to read as follows:

“free of cracking *of skin, mechanical injury/rubbing, staining*”

Rationale: *The injury and staining affects the general appearance of produce and may affect the internal quality due to possible attack of microbes.*

Sub-Section 2.1.1

A new indent may be added as follows:

“- to ensure a continuation of the maturation process until they reach the appropriate degree of maturity corresponding to the varietal characteristics with a minimum TSS value of 14 degrees brix.”

Rationale: *To bring more objectivity to the quality parameter of the fruit.*

Section 2.2 Classification

Sub-section 2.2.1 “Extra” Class:

A new sentence may be included in the “Extra Class” as follows:

“the calyx / crown should be intact or neatly cut”

Rationale: To reduce the microbiological contamination of fruits and to enhance the appeal of the fruit.

Sub-Section 2.2.2 Class I

The last sentence may be modified as follows:

“ the defect must not, in any case, affect the ~~flesh~~ arils of the fruit.

Rationale: “Arils” of the fruits is an appropriate terminology for the pomegranate rather than “flesh”.

Sub-Section 2.2.3 Class II

The last sentence may be modified as follows:

“ the defect must not, in any case, affect the ~~flesh~~ arils of the fruit.

Rationale: “Arils” of the fruits is an appropriate terminology for the pomegranate rather than “flesh”.

Section 3: Provision Concerning Sizing

India would like to include the following size code table in the standard:

Size Code	Weight in grams (Minimum)	Diameter in mm. (Minimum)
A	400	90
B	350	80
C	300	70
D	250	60
E	200	50

Rationale: Size code is mentioned in almost all Codex texts for fresh fruits and vegetables such as Avocado, Baby corn, Gooseberry, Carambola, Chayotes, Ginger, Grapefruits, Guavas, Lime, Longans, Mango, Mangosteens, Mexican limes, Nopal, Orange, Papaya, Pineapple, Pitahayas, Prickly pear, Pummelos, Rambutan, Cassava, Tannia, etc. It is an important aspect for marketing purposes and needs to be included in the standard.

SECTION 4: PROVISION CONCERNING TOLERANCES

SUB-SECTION 4.1.3 CLASS II:

The text may be modified as follows:

“ 10% by number or weight of pomegranates not satisfying neither the requirements of the class nor but meeting those of the minimum requirements, with the exception of produce affected by rotting or any other deterioration rendering it unfit for consumption.

Rationale: The provision for tolerance in respect of quality and size is provided in each class but the produce should meet the minimum requirement as mentioned in Section 2.

SECTION 5: PROVISIONS CONCERNING PRESENTATION

SUB-SECTION 5.2: PACKAGING

2nd Paragraph: It is proposed to modify the second paragraph as follows:

“Pomegranates shall be packed in each container in compliance with the Recommended International Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables (CAC/RCP 44-1995) as amended.”

Rationale: To include updated version of Code of Practice.

SECTION 6: MARKING AND LABELLING

SUBSECTION 6.1: CONSUMER PACKAGES

It is proposed to modify the text as follows:

“In addition to the requirements of the Codex General Standard for the Labeling of Prepackaged Foods (CODEX STAN 1-1985) as amended, the following specific provisions apply: ”

Rationale: To include updated version of the Codex General Standard.

Sub-Section 6.2.4: Commercial Identification

“Size (~~if sized~~) (size code or minimum and maximum weight or diameter in grams or millimeters, respectively)”

Rationale: Commercial identification of produce should be based on the size code of the produce. This helps the trader or distributor to identify the product size and use the information as a marketing tool (fair trade practice).

Section 8: Hygiene

It is proposed that the text may be modified to read as follows:

“It is recommended that the produce covered by the provisions of this Standard be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1-1969) as amended, Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003), and other relevant Codex texts.....”

Rationale: To include updated version of Code of Practice.

ANNEX

It is proposed that the fourth column on fermented fruits may be deleted from the table.

Rationale: There is no existing established method to judge the level of fermentation inside the fruit.

THAILAND

Thailand wishes to thank Iran for leading the work on the Proposed Draft Codex standard for Pomegranate. Thailand would like to make the following comments on the draft standard.

Section 2.1 Minimum Requirements:

We would like to delete the 5th indent “free of dead insects, insects fragment and pest excrement visible to the naked eye”, because it has already been covered in the 3rd indent, “ clean, free of any visible foreign matter” and 4th indent, “free of pests and damage caused by them affecting the general appearance of the produce”.

In the 8th indent, we would like to rewrite the sentence to read “free of damage caused by frost and/or low or high temperature” because “frost” is a damage cause by low temperature.

Section 3 Provisions concerning Sizing

First of all, we would like to propose the sizing table to be used as reference to facilitate trade, which should follow the format of Codex Standard.

Consequently, Thailand would like to propose the table to read as follows:

Size Code	Weight(g)
1	>590-650
2	>530-590
3	>470-530
4	>380-470
5	>300-380
6	>260-300
7	>240-260
8	>200-240
9	175 - 200

When sized by diameter, size is determined in accordance with the following table:

Size Code	Diameter (mm)
1	>114
2	>103-114
3	>92-103
4	>79-92
5	>69-79
6	59-69

Section 5.1 Uniformity

We would like to propose deleting the sentence “Sales packages may contain mixtures of varieties and sizes provided they are uniform in quality and for each variety concerned, from the same origin”. It is not appropriate for a codex standard to allow mixture of sizes or varieties in one package. Moreover, mixed sizes will affect the size tolerance.

7. Food Additive

We would like to add the Section Food Additive in compliance with the section 6.2.4 which stated the sentence “if appropriate, a statement indicating the use of preservative”

Therefore, Thailand recommends that the committee adheres to the recommended format for commodity standards as laid out in the Procedural Manual, as follows:

“Preservative used in accordance with Tables 1 and 2 of the Codex General Standard of Food Additives in food category 04.1.1[Fresh fruit] or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”

Annex

Thailand requests to delete the annex because the annex and note conflict with the minimum requirement.