

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4

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

25th Session
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PROPOSED DRAFT CODEX STANDARD FOR TABLE OLIVES (Revision of CODEX STAN 66-1981)

COMMENTS FROM: Australia, Brazil, Iran, Kenya, Malaysia, Mexico, South Africa, Thailand and
the United States of America

AUSTRALIA

General comments

Australia sees this as being an important revision of a standard which has not been amended for a considerable time. Its revision should reflect changes in production and technology of this commodity, and also changes to the format and content of Codex standards and guidelines over intervening years. We also agree on its harmonisation with the International Olive Council's Trade Standard Applying to Table Olives where appropriate.

Specific comments

2.2.2 Trade preparations

Part (d) Australia notes the proposed addition of the section *Green ripe olives* and suggests that a description also be provided for *green olives or olives turning colour, not fermented, not preserved in brine, and not oxidised, which undergo alkaline treatment*. Such a process which does not use heat treatment is common in some parts of the world, e.g., in Sicily.

Australia notes and supports deletion of section 2.3 *Types of pack*.

3.1.3 Packing media (packing brines)

3.1.3.1 *Physico-chemical characteristics of the packing brine or of the juice after osmotic balance, and*

3.1.3.2 *Characteristics of the thermal pasteurisation and sterilisation treatment applied to table olives, as evaluated in the packing brine or flesh.*

Australia questions the need for the level of detail and prescription in these sections. Information which gives guidance on product and process criteria for the production of microbiologically safe table olives is more appropriate to a code of practice. Simplification of the standard would allow it to be a more usable document

In examining these sections, Australia believes that there are inaccuracies in some of the technical information. For example in section 3.1.3.2 "(D)ecimal reduction time: heating time, in minutes, required to reduce the active population of a bacterial suspension **by one tenth**" Australia suggests should read "**to one tenth**" or "**by 90%**".

If the Committee believes that this technical information is appropriate for a standard, Australia recommends that these sections be referred to the Codex Committee for Food Hygiene as the expert body for verification of technical details, and that they be included as technical annexes, rather than in the body of the standard.

3.2.1 Trade categories

With respect to quality attributes, Australia questions the subjective designation in part 3.2.1.1 of "Extra" or "Fancy" olives, and why only larger fruit are considered for classification in this category.

3.2.2 Uniformity of size

Australia notes and supports the greater flexibility which the rewritten section on size grading now provides. Notwithstanding, we question the need for size uniformity to be specified as we believe it is not necessary to provide this level of prescription in the sizing of a small fruit. Such a requirement for strict size ranges can limit the producer's capacity to sell produce which is of good eating quality, the rejection of which can lead to unnecessary waste of product.

3.2.4 Defects and allowances

As in Section 3.1.3 *Packing media*, Australia questions the need for the level of detail and prescription proposed in this section of this draft, and suggests that this information would be more appropriate for an industry code of practice. The table on maximum defect tolerances for each trade category could be reduced to a cumulative maximum of tolerances for defects. Reduction of technical detail in this commodity standard would allow it to be more usable.

4. Additives

We note the working group's earlier comments with respect to the need to retain specific additive provisions for olives within the standard as they "are a very specific product for which a very limited number of food additives is needed". However, Australia maintains that the same outcome can be achieved within the GSFA through appropriate food additive provisions in food category 4.2.2.3. Such an approach, which might require a proposal to change additive provisions in the GSFA through the Codex Committee for Food Additives, would best progress the Commission's goal of having the GSFA as the single authoritative reference point for food additives in Codex.

Australia notes that provisions within the GSFA food category 4.2.2.3 are not automatically applicable to table olives. Additives allowed in food category 4.2.2.3 can only be used in table olives where such use is technologically justified and in particular, where such use meets the guidance in the preamble to the GSFA relating to justification for use (Section 3.2) and use under the provisions of Good Manufacturing Practice (Section 3.3).

6. Hygiene

6.4 (renumbered from 6.3) Australia suggests that the standard should specify a minimum number of colony-forming units/ml of brine or per g of flesh of lactic bacteria and/or yeasts in the culture medium of fermented olives to ensure proper acidification and to prevent outgrowth of pathogens, while retaining quality aspects of the product. A similar requirement is prescribed in the Codex Standard for Fermented Milks (Codex Stan 243).

Australia suggests that this section be submitted to the Codex Committee for Food Hygiene in order to establish the optimum microbiological range for this commodity to ensure prevention of growth of pathogens while maintaining organoleptic properties of the product.

9 Methods of analysis and sampling

Australia concurs with the advice of the 20th Session of the Committee on Methods of Analysis and Sampling that commodity committees consider replacing Codex Methods of Analysis and Sampling (CAC/RMs) with more modern methods as appropriate, and replace CAC/RM numbers with the original literature references if possible, and when the original reference is not available, the full text of the method should be included. Australia supports the suggestion that the two methods described in the draft revised standard, namely total acidity and pH of brine, should be replaced by relevant methods developed by recognised international organisations such as those proposed in the table or by any other more appropriate method, and that these techniques be referenced rather than described in detail.

This may provide an alternative method to overcome difficulties with the use of a colorimetric method for determination of acidity, given the difficulty of determining the end-point in highly coloured olive brines and with black olives.

Summary

In general terms, Australia would like to reinforce our position that commodity standards should be no more prescriptive than is required to protect the health of consumers and ensure fair practices in food trade. To this end we support the use of simplified text where possible.

BRAZIL

In regard to the aforementioned draft standard, Brazil would like to congratulate EU efforts in the revision of the Codex Standard for Table Olives and to share some general and specific comments aiming harmonization for a better understanding and adoption of the Standard.

General Comments:

Being CODEX Standards also to facilitate commerce, Brazil considers that some reflection should be made against regional or local terms and extensive wording of complex procedures and practices, as these should lead to lesser adopted Standards.

Considering that any effort in terms of harmonization will enforce all the progress made by the Committee on the revision of other standards for processed fruits and vegetables, we share the view that referencing other relevant Codex standards and codes could be prioritized aiming equivalency and better adoption.

The use of local or regional terms may be considered unnecessary, besides reflecting only regional or local legislation.

It should be also noted that the draft standard for table olives increase the maximum defect tolerances for each trade category reducing the overall quality criteria when compared with the current standard. For example table olives classified as “first” in current standard will be classified as “extra” in draft standard of table olives as proposed.

Considering that relevant considerations to review or up-date existing standards could include, matters concerning new scientific information; new technology(ies); urgent problems related to trade or public health, some justification was perceived as needed.

Brazil proposes that the maximum defect tolerances for each trade category should remain as is in Codex Stan 66-1981 not to occur a reduction in quality in world trade for table olives.

Brazil considers that the proposed broad decrease in overall quality of table olives should be based on potential impediments to international trade. Therefore, it is suggested that sound justification should be shown for the Committee on how current provisions limit trade.

Specific Comments:

Sections 3.1.2 Other Permitted Ingredients 3.1.3 Packing Media (packing brines)	
Rationale	For consistency with previous decisions of the Committee, the title of section 3.1.2 should be “Packing Media”.
Suggestion	3.1.2 Other Permitted Ingredients Packing Media

Sections 3.1.3, 3.1.3.1 & 3.1.3.2	
Rationale	<p>Brazil understands that these sections could be revised for those provisions considered as deemed necessary or totally struck out, being all its listed procedures and practices food safety issues and perceived as dealt in Section 6 Hygiene.</p> <p>Brazil would like to highlight that contributes to the removal of Sections 3.1.3, 3.1.3.1 & 3.1.3.2 a similar understanding that was emitted by the Committee, where further detailing was perceived as unnecessary.</p> <p>In that sense further detailing are out of the scope of Commodity Committees and always complies or are described within Hygiene relevant standards and codes, including the Recommended International Code of Hygienic Practice for Low-Acid and Acidified Low-Acid Canned Foods, among others (Alinorm 09/32/27 – Para 48).</p>
Suggestion	To remove Sections 3.1.3, 3.1.3.1 & 3.1.3.2 and all its content/provisions.

Section 3.2.1.1 “Extra” or “Fancy”.	
Rationale	<p>Brazil suggests that the relevance of the continued use of the term “extra” should be clarified before any definition of terms.</p> <p>Moreover lowering provision limits of those table olives currently stated as “extra” is inconsistent with the use of this trade category.</p> <p>Therefore the continued use of the trade category “extra” or “fancy” should be relied to premium products or removed whilst superseded.</p>
Suggestion	<p>3.2.1.1 “Extra” or “Fancy”</p> <p>The high quality olives endowed to the maximum extent with the characteristics specific to the variety and trade preparation are considered as belonging to this category. Notwithstanding, and providing this does not affect the overall favourable aspect or organoleptic characteristics of each fruit, they may have very slight colour, shape, flesh firmness or skin defects.</p> <p>Whole, split, stoned (pitted) and stuffed olives of appropriate varieties may be classified in this category.</p>

IRAN

In the case of "proposed draft standard for table olives"(Revision of codex stan 66-1981)(No2-2009)(At step 3) these comments are recommended:

1 – The title of column two in 3.1.3.1 table in page 6 of ANNEX 1 change from :

Minimum sodium chloride content % to **Maximum** sodium chloride content % in these 3 groups:

1-1 Treated olives

1-2 Natural olives

1-3 Olives darkened by oxidation with alkaline treatment

2 - In 3.1.3.1 table in page 6 of ANNEX 1, the percentage of **maximum** sodium chloride content change to **5%** for **P,S preparation**.

2- Minimum Lactic acidity % Lactic acid for **P ,S preparation** in last column of 3.1.3.1 table **change from GMP to 0.4%** .

3- In section 4 at page 11 of ANNEX I , use of preservatives for pasteurized and sterile products **not be allowed** .

4- In section 7-1-4 **minimum net drained weight** for Whole olives style and Stoned (pitted) or stuffed olives respectively **change to 55% and 50%**.

KENYA**PROPOSED DRAFT CODEX STANDARD FOR TABLE OLIVES (Revision of CODEX STAN 66-1981) (N02-2009)****2. DESCRIPTION****2.1 PRODUCT DEFINITION** "Table olives" is the product

.b) treated to remove its bitterness and preserved by natural fermentation, or by heat treatment, **or by other means** so as to prevent spoilage and to ensure product stability in normal storage conditions at room temperature, with or without the addition of preservatives;

Comment

We propose to delete the word "or by other means" in the above sentence since it will be abused . we realized that all the treatments cannot be mentioned in the standard and ambiguous words/unnecessary words should also be avoided so no one takes an advantage of the situation.

3.2.2 **Uniformity of Size** Table olives shall be uniform in size. If they are size-graded the following scale may be applied. The size scale, in one kilogramme, is as follows:

General Comment

We propose the table of the 'uniform of size' to be given a number.

.(b) **Blemished fruit:** Olives with marks on the skin that are more **than 9 mm²** in surface area and that may or may not penetrate through to the flesh *es which singly or in the aggregate, materially affect the appearance or eating quality of the olives.*

Comment on blemished fruit:

*We propose as follows: "Blemishes to be measured by length in diameter, and not area"
It is very cumbersome and time consuming to use area of a product*

.(k) **"Soft"** – Units lacking the firmness that is characteristic for a particular variety.

Comment

We propose to delete the sentence under (I) for it is not important, what it is intending to cover has been taken care of in (k).

.(l) **"Excessively Soft"** – *Units shall be considered excessively soft when the olives appear to be spongy or watery. Units that have the apparent shape of whole units, but appear to have disintegrated flesh and water texture shall be considered excessively soft. In addition, a unit shall be considered excessively soft if the pit can be felt when applying moderate pressure.*

8.1.1.2.6 The trade category. **Optional-**

Comment: *we have no objection.*

MALAYSIA**2. DESCRIPTION****2.1 PRODUCT DEFINITION**

(b) treated to remove its bitterness and preserved by natural fermentation, or by heat treatment, *or by other means* so as to prevent spoilage and to ensure product stability in normal storage conditions at room temperature, with or without the addition of preservatives;

Comments:

Malaysia proposes that the term “by other means” be specified in the document as to the type of the treatment the product undergoes to remove bitterness and preservation.

2.2.1 Types of Olives

Table olives are classified in one of the following types according to the degree of ripeness of the fresh fruits:

- (a) **Green olives:** Fruits harvested during the ripening period, prior to colouring and when they have reached normal size. The colour of the fruit may vary from green to straw yellow.
- (b) **Olives turning colour:** Fruits harvested before the stage of complete ripeness is attained, at colour change. The colour of the fruit may vary from rose, wine-rose or brown.
- (c) **Black olives:** Fruits harvested when fully ripe or slightly before full ripeness is reached. The colour of the fruit may, according to production region and time of harvesting, be reddish black, violet black, deep violet, greenish black or deep chestnut not only on the skin but also through the flesh.

Comments:

Malaysia proposes to retain the description on colours of the fruit indicated in red text as in the current CODEX STAN 66-1981. The product itself is referred by colour.

MEXICO

We support the proposal as these additives are being revised and updated.

4. FOOD ADDITIVES

Only those food additive classes listed below are technologically justified and may be used in products covered by this Standard. Within each additive class only those food additives listed below, or referred to, may be used and only for the functions, and within limits, specified.

4.1 ACIDITY REGULATORS

INS No.	Name of the Food Additive	Maximum Level (expressed as m/m weight of flesh)
260	Acetic acid (glacial)	Limited by GMP
270	Lactic acid (L-, D-, and DL-)	Limited by GMP
330	Citric acid	Limited by GMP
334	Tartaric acid (L(+)-)	1500 mg/kg

4.2 ANTIOXIDANTS

INS No.	Name of the Food Additive	Maximum Level (expressed as m/m weight of flesh)
300	Ascorbic acid (L-)	Limited by GMP
220, 221, 222, 223, 224, 225, 227, 228, 539	Sulphites	100 mg/kg weight of flesh

4.4 FLAVOUR ENHANCERS

INS No.	Name of the Food Additive	Maximum Level (expressed as m/m weight of flesh)
621	Monosodium glutamate	500 mg/kg

4.5 FLAVOURING AGENTS

Natural flavours as defined by the <i>Codex Guidelines for the Use of Flavourings</i> (CAC/GL 66-2008).	Limited by GMP
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4.6 PRESERVATIVES

INS No.	Name of the Food Additive	Maximum Level (expressed as m/m weight of flesh)
200, 201, 202	Sorbic acid and its sodium and potassium salts	500 mg/kg (expressed as sorbic acid)
210, 211, 212	Benzoic acid and its sodium and potassium salts	1000 mg/kg (expressed as benzoic acid)
220, 221, 222, 223, 224, 225, 227, 228, 539	Sulphites	100 mg/kg weight of flesh

4.7 COLOUR RETENTION AGENTS (to maintain the colour of olives darkened by oxidation)

INS No.	Name of the Food Additive	Maximum Level (expressed as m/m weight of flesh)
579	Ferrous gluconate	150 mg/kg (as total Fe)
585	Ferrous lactate	150 mg /kg (as total Fe)

4.8 THICKENERS (solely for pastes intended for stuffing)

Thickeners used in accordance with Table 3 of the <i>Codex General Standard for Food Additives</i> (CODEX STAN 192-1995) are acceptable for use in foods conforming to this Standard.

4.9 PROCESSING AIDS (maximum level limited by Good Manufacturing Practices)

Function	Substance
Fermentation control	1.1 Cultures of lactic microorganisms
Prevention of the presence of O ₂	1.2 Nitrogen
Prevention of the presence of O ₂ and preservation	1.3 Carbon dioxide
Homogenization and improvement of colour development	1.4 Manganese lactate
	1.5 Manganese gluconate
Debitting and darkening (ripe olives)	1.6 Sodium or potassium hydroxide
Control of pH	1.7 Hydrochloric acid

SOUTH AFRICASpecific comments

3.2.2 Uniformity of Size

Table olives shall be uniform in size. If they are size-graded the following scale may be applied.

The size scale, in one kilogramme, is as follows:

~~60/70 101/110 161/180 261/290~~

~~71/80 111/120 181/200 291/320~~

~~81/90 121/140 201/230 321/350~~

~~91/100 141/160 231/260 351/380~~

~~381/410*~~

~~* Above 410, the interval is 50 fruits.~~

91/100 – Super Mammoth**101/110 – Mammoth****111/120 – Super Colossal****121/140 – Colossal****141/160 – Giant****161/180 – Extra Jumbo****181/200 – Jumbo****201/230 – Extra Large****231/260 – Large****261/290 – Superior****291/320 – Brilliant****321/350 – Fine****351/380 – Bullet***

*** Above 380, the interval is 50 fruit**

Rationale: In the trade, names are given to different size categories. Unless this is defined in the Standard there can be confusion

THAILAND

We would like to propose reformatting the Proposed Draft Codex Standard for Table Olives to be in line with the standard layout for Processed Fruits and Vegetables. For example, section 3.1.3.1 Physico-chemical of the packing brine or of the juice after osmotic balance and section 3.1.3.2 Characteristics of the thermal pasteurisation and sterilisation treatment applied to table olive should be deleted because both sections are mentioned in Section 6 Hygiene.

UNITED STATES

The United States welcomes the opportunity to comment on the proposed draft revised Codex Standard for Table Olives (Revision of CODEX STAN 66-1981) prepared by the CCPFV Table Olive working group led by the European Union.

General Comments

1. The CCPFV should consider a closer alignment of the draft revised standard with the CCPFV standard layout for processed Fruits and Vegetables.

Rationale: *The revised draft standard includes new sections with other other parts moved from sections of the annex to CODEX STAN 66-1981 without explanation. These changes make the draft standard more complicated, contrary to the original intent to “simplify and modernize the standard.”*

2. The U.S. cautions against depending too heavily on the contributions of the International Olive Council (IOC).

Rationale: *The IOC is comprised mainly of olive producers and industry members that pay membership fees; the mandates of the IOC and the Codex Committee on Processed Fruits and Vegetables are very different; and no other CCPFV standard appears to rely so heavily on input by producers.*

Nevertheless, the U.S. supports retaining the Qualitative Classifications of the International Olive Oil Council Standard for table olives as an Annex to this revised Codex Standard for Table Olives as found in CODEX STAN 66-1981. These higher qualitative classifications of the IOC standards are not affected by the provisions of the Codex Standard; in the interests of simplifying the standard, they can be used to replace parts of and Section 3.2 Quality factors (3.2.1 to 3.2.1.3) and Definition of Defects Section 3.2.3.

Specific Comments

Changes to the draft text proposed by the U.S. are in **bold** with rationales provided.

PROPOSED DRAFT REVISION
CODEX STANDARD FOR TABLE OLIVES

2. DESCRIPTION

2.1 PRODUCT DEFINITION

"Table olives" is the product:

- (b) "treated to remove its bitterness and preserved by natural fermentation **and/** or by heat treatment **and/** or **by other means**, so as to prevent spoilage and to ensure product stability in normal storage conditions at room temperature, with or without the addition of preservatives;

Rationale: The U.S. recommends retention of the phrase "by other means" because some green olives are not fermented, but treated with alkaloids.

2.2.1 Types of Olives

- (c) **Black olives:** Fruits harvested when fully ripe or slightly before full ripeness is reached **or treated/ oxidized during processing resulting in a dark brown to black color.**

Rationale: the U.S recommends that this change since olives blackened during oxidation are also classified, labelled, sold and accepted as black olives, without consideration to the method of blackening.

2.2.2 Trade Preparations/Treatments

Rationale: the U.S. suggest that the word "**Treatment**" should either replace preparations or be inserted next to it for consistency with the preceding text in Sections 2.1 and 2.2..

- (a) **Treated olives:** Green olives, olives turning color or black olives that have undergone alkaline treatment, then packed in brine in which **may or may not** undergo complete or partial fermentation, and preserved or not by the addition of acidifying agents:

Rationale: the U.S. recommends including "**may or may not**" to consider treated green olives in brine, where the product is treated in alkaline lye and then packed in brine in which may undergo complete natural lactic fermentation (Sevillan style) or partial natural lactic fermentation.

2.4 STYLES

Olives may be offered in one of the following styles:

2.4.4 **Salad olives:** Whole broken or broken-and-stoned (pitted) olives with or without capers, **or other appropriate edible ingredients**, plus stuffing material, where the olives are the most numerous compared with the entire product marketed in this style.

Rationale: the U.S. recommends including the additional text "**or from other appropriate edible ingredients**" because the current text limits the type of stuffing and innovation.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 COMPOSITION

3.1.3 Packing Media (packing brines)

Delete tables in Sections 3.1.3.1 and 3.1.3.2

Replace with:

Black olives: NaCl range between 3 and 14 degrees salometer or 0.79 to 3.65% and a pH greater than 4.6.

Rationale: Instead of the tables in Sections 3.1.3.1 and 3.1.3.2 , which complicate the standard , the U.S recommends a sodium chloride range based on preparation/treatment listed in Section 2.2.2. d. d-1.

The U.S. recommends that the only criteria should be NaCl for canned ripe olives as described in section 2.2.2 (d-1).

The existing standard addresses pH and NaCl for some styles/preparation types in a very prescriptive manner. Additionally, the U.S. believes these provisions in the existing Codex standard (CODEX STAN 66 -1981) and the proposed table in the draft revised standard are both overly restrictive.

Delete 3.2.1 -3.2.1.3 under QUALITY FACTORS

Rationale: The U.S. believes that this section “Quality Factors” is unnecessary and inconsistent with Codex Processed Fruit and Vegetable standard practices of setting an absolute minimum standard. This section is also inconsistent with industry and regulatory practices. Since there is no precedence for the inclusion of classes/grades in CCPFV standards, the U.S. recommends the deletion of Section 3.2.1 to Section 3.2.1.3 or including them in an annex as they appear in the current standard (CODEX STAN 66-1981).

3.2.2 Uniformity of Size

Table olives [**may** ~~shall~~] be size-graded according to the following size scale. **If applied**, size-grading shall be carried out based on the number of fruits per kilogramme or hectogramme. ~~It shall be compulsory for olives in the whole, stoned (pitted) and stuffed styles.~~

The size scale, in one kilogramme, is as follows:

60/70	101/110	161/180 large	261/290 small
71/80 super colossal	111/120	181/200	291/320 petite or midget
81/90 colossal	121/140 extra large	201/230 medium	321/350
91/100 jumbo	141/160	231/260	351/380
			381/410* sub- petite

* Above 410, the interval is 50 fruits.

~~Different scales may nevertheless be applied according to agreements between the parties concerned.~~

~~Solely where stuffed olives are concerned, as from size 201/220 the interval is 20 fruits up to size 401/420.~~

~~Size-grading may be applied for olives in the whole, stoned (pitted) and stuffed styles.~~

Rationale: The U.S. recommends that word “shall” be replaced with “**may**.” The use of “shall” makes Uniformity of Size mandatory and therefore limits the marketing of mixed sizes. Furthermore, countries may use sizing scales that are different from those listed in the table. Such issues are best addressed between trading parties.

Regarding the other suggested changes on size scale, table olives sold in the U.S. are not labelled according to the number of fruit per kilogramme but by size designation such as, *i.e.*, petite, sub-petite, small medium, large, jumbo, colossal, super colossal; (U.S. size designations are shown in italics within the table). Therefore, the CCPFV should consider making additional allowances for such designations.

3.2.2 Uniformity of Size (continued)

In the case of stoned (pitted) olives or stuffed olives (after removing the stuffing), the size shown shall be the one corresponding to the original whole olive. *For the purpose of checking, the number of stoned (pitted) olives in one kilogramme shall be multiplied by a coefficient set by each producing country.*

~~Within each size as defined above, it is stipulated that after having removed from a sample of 100 olives, the olive having the largest horizontal diameter and the olive having the smallest horizontal diameter, the difference between the horizontal diameters of the remaining olives may not exceed 4 mm. Or the maximum permitted tolerance shall be:~~

- ~~-10% for sizes with a 10-fruit interval;~~
- ~~-5% for sizes with a 20-fruit interval;~~
- ~~2% for sizes with a 30 or more fruit interval.~~

Within each size and after having removed, from a sample of 100 olives, the olive having the largest horizontal diameter and the olive having the smallest horizontal diameter, the maximum permitted tolerance shall be:

- 10% for sizes with a 10-fruit interval;
- 5% for sizes with a 20-fruit interval;
- 2% for sizes with a 30 or more fruit interval

Rationale: The U.S. recommends deleting the phrase, “*for the purpose of checking, the number of stoned (pitted) olives in one kilogramme shall be multiplied by a coefficient set by each producing country*” because it is unnecessary and burdensome.

The U.S. recommends this new text under 3.2.2, starting with the word “Within” because the current draft text is unnecessarily restrictive and contrary to established trading practices. Furthermore, if adopted, this change which will have profound effect on the table olive trade. The US recommends the insertion of Section 2.2.4.5 (paragraph below) from the existing Codex standard CODEX STAN 66 - 1981.

3.2.3. Definitions of Defects

- (b) **Blemished fruit:** Olives with marks on the skin that are more than ~~9 mm²~~ **6 mm in diameter** that may or may not penetrate through to the flesh **which singly or in the aggregate, materially affect the appearance or eating quality of the olives.**

Rationale: The U.S. proposes to further clarify the definition of defects for blemished fruit which would enable the classification of all blemished units to be consistent with the definitions in the standards. Additionally, there must be a stronger correlation between trade preparation/treatment and each type of blemish. Depending on the trade preparation/treatment, a blemish or blemishes may be more prone to occur, or become more pronounced, or disappear completely. Within the trade in North America, skin defects in table olives are measured in diameter and not by area.

- ~~(k) [“Soft” – Units lacking the firmness that is characteristic for a particular variety.~~

Rationale: The U.S. withdraws its request to include “soft” in the Definition of Defect, but maintains the need for the inclusion of “Excessively Soft” since this defect is more serious and more easily identified.

3.2.4 Defects and Allowances

Replace current table with the following:

Maximum tolerance as percentage of fruits per 100 units

List of defects for whole and pitted olives	Green olives	Olives turning color and olives darkened by oxidation;	Black Olives
(a) Blemishes major & minor	25	10	12
(b) Damage affecting flesh	10	10	8
(c) Shrivelled fruits	10	10	10
(d) Soft or fibrous fruit	10	10	12
(e) Abnormal colour			10
(f) Mechanical damage or Mutilated	20	40	10
(g) Cryptogamic and mould damage	0.8	0.6	0
(h) Damage by insects			12
(i) Damage caused by abnormal cultivation practices	Devoid	Devoid	Devoid
(j) Damage by <i>Dacus Oleae</i>	10	10	10
(k) Stems	4	6	5
Stuffing defects:			
(l) Olives without stuffing:			
- Place-packed			
- Random-packed			
(m) Defective stuffing	10	10	10
(n) Chopped or minced, broken and salad olives (on a 300 gramme basis)	2	2	2

List of defects for whole and pitted olives	Green olives	Olives turning color and olives darkened by oxidation;	Black Olives
Stone (pit) fragments:	3	1.3 avg	
(o) Stoned (pitted) and stuffed olives	1.3	1.3	1.3
(p) Chopped or minced, broken and salad olives (on a 300 gramme basis)	2	2	2
Broken stones (pits):			
(q) Bruised	6	6	
(r) Under no circumstances shall the total tolerance figure exceed	17%	17%	17%
Harmless foreign matter- by count	2	2	2

N.B. when tolerances are applied to Olive halves use 200 units/pieces.

The tolerances shall be assessed in a minimum sample of 200 olives taken in accordance with the appropriate sampling plan with an AQL of 6.5.

Olives presented in the halved, quartered, divided, sliced, chopped or minced, broken, salad olive (except when prepared with whole olives) and olive paste styles: the presence of a stone (pit) or stone (pit) fragment shall be tolerated in every 300 g of net drained content of olive flesh.

Rationale: The U.S. proposes a more simplified minimum requirement per broad categories of Trade Preparation. The U.S. believes that the Codex Standard for Table Olives should establish a single baseline tolerance for defects and that it is not appropriate for the Codex standard to prescribe quality levels above this baseline. The Codex standard provides definitions of defects and traders can establish tolerances for defects above the baseline levels.

4. FOOD ADDITIVES

General Comment: The U.S. suggests that functional classes included in the revised draft standard be based on those listed in the Codex Stan 66-1981 and agreed upon by the Committee, in recognition of the statement at the 58th Session of the Executive Committee, subsequently endorsed by the 28th session of the Commission, that “the GSFA should be the single authoritative reference point for food additives and this should be made clear in all commodity standards” (Alinorm 05/28/3A, paragraph 56 [15]).

The standard for table olives corresponds to GSFA food category 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce). This food category is broad and covers many standardized as well as non-standardized foods. The GSFA groups all the tartrates together because they share a JECFA ADI, and all tartrates are listed as acidity regulators in the INS list (CAC/GL 36-1989).

Section 4, Food Additives- Acidity regulators lists Tartaric acid (L(+)-) (INS 334) for use as an acidity regulator at a maximum level of 1500 mg/kg. No reasons were given for excluding other approved tartrates from the standard (viz. monosodium tartrate, INS 335(i); disodium tartrate, INS 335(ii); monopotassium tartrate, INS 336(i); dipotassium tartrate, INS 336(ii) and potassium sodium tartrate (INS 337)).

This exclusion of the other tartrates was not supported by any technological justification based on Section 3.2 of the Preamble of the GSFA (CX STAN 192) for excluding the acidity regulators -tartrates (INS 334, 335(i), 335(ii), 336(i), 336(ii) and 337) with a single combined acceptable maximum use level from the standard. Such selective exclusion based on national or regional production practices, regulations and/ or consumer preferences strengthens the U.S. position that a general reference to the GSFA must be made. This allows producers to select additives and preservatives that best match their production practices, geo-climatic conditions, national regulations and consumer preferences. In addition, this selective exclusion is also applied to antioxidants and preservatives in this section of the standard.

6. HYGIENE

Delete 6.3 and 6.4 and replace with the following:

~~6.3 Fermented olives held in a packing medium may contain micro organisms used for fermentation, notably lactic bacteria and yeasts. The number of such micro organisms (lactic bacteria and/or yeasts) in a selective culture medium may, for each one, be up to 10⁹ colony forming units/ml of brine or per g of flesh depending on the level of fermentation.~~

6.4 ~~Fermented olives held in a packing medium may contain micro-organisms used for fermentation, notably lactic bacteria and yeast. The number of such micro-organisms (lactic bacteria and/or yeasts) in a selective culture medium may, for each one, be up to 10 colony forming units/ml of brine or per g of flesh depending on the level of fermentation.~~

6.3 When tested by appropriate methods of sampling and examination, the product:

- shall be free from microorganisms in amounts which may represent a hazard to health;
- shall be free from parasites which may represent a hazard to health; and
- shall not contain any substance originating from microorganisms in amounts which may represent a hazard to health.

6.4 Olives preserved by heat sterilisation (such as olives darkened by oxidation) shall have received a processing treatment sufficient both in time and temperature to destroy spores of *Clostridium botulinum*.

Rationale: The U.S believes that the text of this section from the existing standard (CODEX STAN 66-1981 Rev. 1-1987) is more appropriate and easier to understand and should be maintained.

7. WEIGHTS AND MEASURES

7.1.4 Minimum Net Drained Weight

Delete current text and insert the following text from Section 8.1. Fill of Container of the previous standard:

The product, including covering liquid, shall occupy not less than 90% of the water capacity of the container. This capacity is equal to the volume of distilled water at 20oC which the container can hold when completely filled.

The weight of the product contained in each pack shall be the maximum allowed by the processing method, without being prejudicial to the quality of the contents.

Rationale: The U.S. recommends this change for the following reasons:

- i. Differences in national legislations concerning drained weights and the ongoing efforts of the International Organisation of Legal Metrology (OIML) Technical Committee six(TC6) to address inconsistencies in the sampling plans and the statistics on which sample correction factors and the number of pre-packages in a sample allowed to exceed the permitted tolerable deficiency are based.
- ii. The percentages values are too restrictive and prescriptive and do not consider the effects of the different sizes of olives have on the weight of individual containers.
- iii. There is no international accepted uniformity of containers as indicated in the table.

8. LABELLING

~~8.1.1.2.2 The trade preparation as described in Section 2.2.2. This may be replaced by the trade preparation in use in the country of sale.~~

Rationale: The preceding section as amended sufficiently addresses this matter; therefore it should be deleted.

DETERMINATION OF WATER CAPACITY OF CONTAINERS (CAC/RM 46-1972)

1 SCOPE

This method applies to glass containers¹.

General Comment: Increasingly, table olives are packaged in other containers such as cans and plastic and /or foil pouches; therefore, we recommend that CCPFV members assist in identifying methods for determining water capacity of all such containers.

4. CALCULATION AND EXPRESSION OF RESULTS

~~DETERMINATION OF ACIDITY²~~

~~Transfer 25 ml of the brine by pipette to a 150 ml conical flask and add a few drops of phenolphthalein indicator. Titrate the solution with 0.1N sodium hydroxide solution until a permanent pink colour persists on shaking. The sodium hydroxide solution may be standardized against dried A.R. grade potassium hydrogen phthalate, and any necessary factor applied.~~

~~1 ml 0.1N NaOH = 0.0090 g lactic acid.~~

¹ For determination of water capacity in metal containers the reference method is ISO 90.1:1986.

² The presence of acidic food additives affects the interpretation of the results.

DETERMINATION OF pH

~~Set up and adjust a pH meter and the glass and calomel electrodes according to the manufacturer's operating instructions for use at 20°C. Calibrate the instrument with a recognized buffer solution of pH 4.0 at 20°C. Rinse the electrodes free from buffer solution with copious amounts of distilled water. Dip the electrode into the sample contained in a beaker and justed to 20°C. Read the pH to the nearest 0.05 units.~~

Rationale: The U.S. believes that these prescriptive methods are not necessary and recommends referencing of the scientific method for determining acidity and pH as done in other CCPFV standards.