

CODEX ALIMENTARIUS COMMISSION



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United Nations



World Health
Organization

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Agenda Item 8

CRD07

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES Twenty-first Session

Monterrey, Nuevo León, Mexico, 7 – 11 October 2019

Comments of Indonesia

Agenda Item 8: Proposed Draft Standard for Onions and Shallots

General Comments

Indonesia would like to thank for the opportunity to provide comments on the Proposed Draft Standard for Onions and Shallots prepared by the electronic working group. We appreciate the effort that has been done by the electronic working group in preparing the documents to be in line with the recent Codex layout and referred to UNECE standards. However, as a producer of shallot which has a specific variety, colour and size, we still have the view that some provisions need to be further discussed to clarify the difference between onions and shallots. Therefore, another round of discussion in the electronic working group should be further considered by the Committee to be carried out before final adoption.

Specific Comments

The following are our comments for several provisions:

Proposed Draft Standard	Proposed Change	Justification
2. DEFINITION OF PRODUCE		
This standard applies to onions of varieties grown from <i>Allium cepa</i> L. Cepa group of the Amarilidaceae family and shallots grown from <i>Allium cepa</i> L. <i>Aggregatum</i> group and <i>Allium oschaninii</i> O. Fedtsch., to be supplied fresh to the consumer. Green onions and green shallots with full leaves as well as onions and shallots intended for industrial processing are excluded.	This standard applies to onions of varieties grown from <i>Allium cepa</i> L. Cepa group of the Amarilidaceae family and shallots grown from <i>Allium cepa</i> L. <i>Aggregatum</i> group and <i>Allium oschaninii</i> O. Fedtsch., <i>Allium ascalonicum</i> group , to be supplied fresh to the consumer. Green onions and green shallots with full leaves as well as onions and shallots intended for industrial processing are excluded.	According to scientific nomenclature available on FAO website*, which is also used in Indonesia, shallots are known as <i>Allium ascalonicum</i> .
* http://ecocrop.fao.org/ecocrop/srv/en/cropListDetails?code=&relation=beginWith&name=shallot&quantity=5		
According to their shape, the onions or shallots can be distinguished in round, elongated, long or demi-long. According to their outer skin color the onions and the shallots can present color white, purple, red, grey or yellow.	According to their shape, the onions or shallots can be distinguished in round, elongated, long or demi-long. with single bulb, while shallots can be distinguished in round, elongated, long or demi-long with cluster bulbs. According to their outer skin color, the onions and the shallots can present color white, purple, red, grey or yellow, while the shallots can present commonly red.	The existing definition of onions and shallots is too general. Therefore, it is needed to elaborate the definition in more detail. Indonesia proposes to distinguish the shape and outer skin color between shallots and onions, to avoid fraudulent practices and disputes in international trade of the layered bulb vegetables commodities.
3. PROVISIONS CONCERNING QUALITY		
• free from mould and yeast.	• practically free from mould and yeast.	It is hard to ensure onions and shallots free from mold and yeast, since from onions and

Proposed Draft Standard	Proposed Change	Justification
		shallots cultivation until postharvest have high risk contamination. However, it can be managed the contamination up to minimum level.
<p>3.2.2 Class II This class includes onions and shallots that do not qualify for inclusion in Class I but satisfy the minimum requirements specified in section 3.2.1 above.</p>	<p>3.2.2 Class II This class includes onions and shallots that do not qualify for inclusion in Class I but satisfy the minimum requirements specified in section 3.2.1 3.1 above.</p>	Editorial correction
4. PROVISIONS CONCERNING SIZING		
<p>4.1 Onions and shallots may be sized by the maximum diameter of the equatorial section in accordance with existing trade practices, the package must be labelled with the size and method used. The minimum diameter shall be:</p> <ul style="list-style-type: none"> • 10 mm for onions and grey shallots and • 15 mm for other shallots. <p>The maximum diameter shall be:</p> <ul style="list-style-type: none"> • 55 mm for round shallots and • 60 mm for demi-long and long shallots. 	<p>4.1 Onions and shallots may be sized by the maximum diameter of the equatorial section in accordance with existing trade practices, the package must be labelled with the size and method used. The minimum diameter shall be:</p> <ul style="list-style-type: none"> • 10 mm for onions and grey shallots and • 15 mm for other shallots. <p>The maximum diameter shall be:</p> <ul style="list-style-type: none"> • 55 mm for round shallots and • 60 mm for demi-long and long shallots. <p>The minimum diameter for onions is 10 mm. The diameter for shallots is ranging from 15 mm to 35 mm.</p>	<p>Presenting of diameter of each commodity is easier to be referred. We recognize shallots with diameter less than 15 mm as by product, which is produced due to in-optimum cultivation condition. In addition, shallots with diameter more than 35 mm are not common in Indonesian market.</p>
<p>4.2 To ensure uniformity in size, the range in size between produce in the same package shall not exceed:</p> <p>4.2.1 For onions</p> <ul style="list-style-type: none"> • 5 mm where the diameter of the smallest onion is 10 mm and over but under 20 mm. However, where the diameter of the onion is 15 mm and over but under 25 mm, the difference may be 10 mm; • 15 mm where the diameter of the smallest onion is 20 mm and over but under 40 mm; • 20 mm where the diameter of the smallest onion is 40 mm and over but under 70 mm; <p>4.2.2 For shallots</p> <ul style="list-style-type: none"> • 10 mm where the diameter of the smallest shallot is 10 mm and over but under 15 mm; • 15 mm where the diameter of the smallest shallot is 15 mm and over but under 20 mm; • 20 mm where the diameter of the smallest shallot is 20 mm or over. 		<p>Indonesia is of the view that the section 4.2 is ambiguous, so that it is proposed the section to be further re-drafted. For instance, in case of onions (section 4.2.1) the classification of 15 mm and over but under 25 mm is intercepted with classification of 10 mm and over but under 20 mm. In case of shallots (section 4.2.2), we proposed size tolerance as follows :</p> <ul style="list-style-type: none"> • 5 mm where the diameter of the smallest shallot is 15 mm and over but under 25 mm; • 10 mm where the diameter of the smallest shallot is 25 mm and over but under 35 mm;