

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
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Agenda Item 6

CX/PFV 16/28/6

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

28th Session
Washington DC, United States of America,
12 – 16 September 2016

DISCUSSION PAPER ON STANDARDIZATION OF DRY AND DRIED PRODUCE

Codex Members and Observers kindly are invited to consider the conclusions and recommendations in paragraph 12 while taking into account the mandate Working Group (paragraph 5) and the information and data provided in paragraphs 7, 8 and 11 in order to assist the Committee on how to proceed further with the standardization of dry and dried produce in the Committee on Processed Fruits and Vegetables.

INTRODUCTION

1. The Committee on Processed Fruits and Vegetables at its 26th Session (October 2012) agreed that the Delegation of Brazil would prepare a discussion paper on ways to deal with the standardization of dry and dried produce including the possibility to have a general standard for these products.¹ Brazil prepared this paper with the assistance of the Codex Secretariat.

2. At the 27th Session of CCPFV (September 2014) Brazil presented the Discussion Paper on Standardization of Dry and Dried Produce² with an overview of dry and dried produce standards / standardization in Codex, showing the relevance of this set of products in international trade. The presentation was followed by a discussion in the Committee on the considerations, conclusions and questions put forward in the paper.

3. The discussion paper also reassessed the approach followed by CCPFV for the revision of a number of standards for canned fruits and vegetables namely whether they could be simplified and grouped into more horizontal standards to facilitate their acceptance by Codex members and subsequent updating in future. Such approach follows the recommendation of the Codex Alimentarius Commission to move towards simplified horizontal rather than detailed individual commodity standards where possible³.

4. The Committee noted the widespread interest expressed during the presentation of the discussion paper and agreed to establish of an Electronic Working Group on Dry and Dried Produce (EWG-DDP). The List of Participants of the EWG is presented in Appendix II to this document.

5. The mandate of the EWG-DDP is to reassess conclusions and recommendations of the discussion paper, evaluate provisions of remaining dry and dried products standards that might need revision, and provide information to the next session of CCPFV to assist in its future decisions on work priorities.

BACKGROUND AND OUTCOME OF THE WORK

6. The EWG-DDP conducted its work with a set of two questionnaires and three electronic surveys and reassessed the conclusions and recommendations of the Discussion Paper. A summary of the responses and outcomes of each step followed by the EWG is provided in Appendix I to this document (for information).

7. To perform the work the EWG-DDP took the following from the conclusions of the discussion paper as a reference for the work, specifically:

¹ [REP13/PFV](#), paras. 153-154.

² [CX/PFV 14/27/11](#).

³ [ALINORM 99/27](#), paras 6 and 9; [ALINORM 01/27](#), para 5; [ALINORM 09/32/27](#), para. 106; [REP 11/PFV](#), para 109; [REP13/PFV](#), para 150; [ALINORM 99/37](#), para 34, [REP15/PFV](#), paras 114, 119.

a) The adoption of the few Codex standards for dry/dried produce developed by CCPFV as a baseline for the discussions, namely: Standard for Apricots ([CODEX STAN 130-1981](#)), Standard for Dates ([CODEX STAN 143-1985](#)), Standard for Raisins ([CODEX STAN 67-1981](#)) and Standard for Pistachio Nuts ([CODEX STAN 131-1981](#));

b) Other approaches and products, such as to look into the possibility to develop general standards for e.g. “nuts”, “dried fruits” and possibly “dried vegetables”.

8. Questionnaire 1 tried to assess on whether to start the work addressing those two points and Questionnaire 2 outlined the ways on how the EWG should proceed. According to the responses received:

- (i) there was support for the revision of the Standards for Pistachio nuts, Dates and Raisins as individual standards;
- (ii) the Standard for Apricots did not receive any remark and was set aside;
- (iii) one member of the EWG volunteered to prepare the Project Documents for new work on the revision of the Standards for Pistachio Nuts and Dates;
- (iv) the development of a general Standard for Nuts and/or for Dried Fruits was considered premature but not precluded for future debate;
- (v) there were no requests or comments on another general or specific standard such as for dried vegetables or other products.

9. Following the set of two questionnaires the EWG responded three surveys accessing the specific Standards of Pistachio nuts, Dates and Raisins.

10. The surveys intended to validate the need to revise those Codex standards, identifying the provisions that were outdated and/or needed revision.

11. A compilation of the responses and a set of possible conclusions was circulated at the end of the surveys to assist the elaboration of the Report of the EWG-DDP. According to the responses received:

- (i) the support to revise Standards for Pistachio Nuts, Dates and Raisins was justified as the respondents of the questionnaires could detect many sections as outdated and/or relevant to revision
- (ii) such awareness was clearer for the Standards for Pistachio Nuts and Raisins and less clear for the Standard for Dates
- (iii) most of the sections with wording not currently adopted for the elaboration of standards by CCPFV were identified as changeable/removable for the three Codex standards evaluated, namely sections related with ingredients/raw material, allowances for defects, lot acceptance and weights and measures
- (iv) for the English version of the Standard for Raisins one member of the EWG have detected an inconsistency in Section 2.3 Styles (or Forms) “a” and “b”, as the definitions adopted do not match the titles.

CONCLUSIONS AND RECOMMENDATIONS

12. After analyzing the set of responses to the questionnaires and surveys, and in light with the conclusions and the mandate of the EWG-DDP, the Working Group recommends:

a) Full revision of the Standards for Pistachio Nuts;

b) Revision of the following Sections of the Standard for Dates:

- b1. 2.2 Varietal Types
- b2. 2.5. Size Classification
- b3. 3.2.3 Allowance for Defects

c) Revision of the following Sections of the Standard for Raisins:

c1. 2.3 Styles (or Forms) “a” and “b”

- c2 3.2.2. Minimum Quality Requirements “a”
- c2 3.2.4. Allowances for Defects

d) Evaluation if the Standards for Dates and Raisins could be simplified and grouped into more horizontal standard;

e) Evaluation if the Standard for Pistachio Nuts could be simplified and set as a frame for the incorporation of other tree nuts such as Brazil nuts to function as a grouped horizontal standard.

APPENDIX I
FOR INFORMATION ONLY
(ORIGINAL LANGUAGE)

QUESTIONNAIRE No1 TO THE ELECTRONIC WORKING GROUP ON**DRY AND DRIED PRODUCE (eWG-DDP)****CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CCPFV)****Background**

The Committee on Processed Fruits and Vegetables at its last 27th Session noted the widespread interest expressed during the presentation of the Discussion Paper on Standardization of Dry and Dried Produce (CX/PFV 14/27/11) Prepared by Brazil with the assistance of the Codex Secretariat.

In addition, the CCPFV approved the establishment of an electronic working group (eWG) to reassess conclusions and recommendations of the discussion paper, evaluate provisions of remaining dry and dried products standards that might need revision, and provide information to the next session of the CCPFV to assist in its future decisions on work priorities.

In order to allow an assessment on whether to start the work, the eWG on Dry and Dried Produce (DDP) would like to issue an initial questionnaire to collect comments and information on the following⁴:

Question 1-A: Taking into consideration that Codex Standards for DDP (i.e., apricots, dates, raisins and pistachio nuts) were developed in the early 80s, does the eWG identifies/justifies a specific need for actualization of such Standards as current versions would be considered to be insufficient to meet Codex objectives? In the case of an affirmative answer, please provide a justification.

Question 1-B: Based on the justification provided for Q.1-A, is the review of any of such Codex Standards needed? In that case, please nominate and/or rank which Standard(s) need revision.

Question 2-A: Some DDP have the addition of ingredients like sugars or syrups (raisins, dates) or salt (pistachio nuts) while others refer only to the dried produce without any further processing or addition of ingredients (apricots). This could be the situation of many produce identified as “dried fruit” or “nuts” and may not present major difficulties to group them into a single standard for “dried fruits” or “nuts”. There may however be situations where the process applied and the ingredients used may result in a final product with distinctive characteristics from the products usually associated to “dried fruits” e.g. shredded or flaked coconut, dried fruit leather/rolls, etc.

Based on the statement above and taking into consideration the different types of DDP presently on the market, besides the need to revise any of the current Codex Standard for DDP, could the eWG recommend grouping single Standards into two separate Standards? For example, one for Dried Fruits (apricots, dates and raisins) and another for Nuts (pistachio nuts).

Question 2-B: In the case of an affirmative answer for Question 2-A, could the eWG:

- Identifies which possible product groupings would be prioritized in relation to their importance in international trade (i.e., nuts or dried fruits)? Please specify.
- Agrees to adopt pistachios as a framework for a Future Codex Standard for Nuts?

Or

Identifies what products (i.e., apricots, dates or raisins) would be adopted as a framework for a Future Codex Standard for Dried Fruits?

Question 2-C: In the case of a negative answer for Question 2-A, could the eWG identifies any major DDP currently being marketed in international trade and having a Codex Standard that could start future work in relation to the review of Codex Standards for DDP? Please specify (i.e., apricots, dates, pistachios or raisins).

Brazil will consider the information provided in response to the aforementioned questionnaire and circulate for further comments for the next round of discussions.

Information on issues listed as Questions 1 up to 2C should be sent (preferably in word file) to the addresses indicated above by **29 May 2015**.

⁴ For detailed information on the Questions, please consult the Discussion Paper on Standardization of Dry and Dried Produce (CX/PFV 14/27/11).

RESPONSES TO THE QUESTIONNAIRE Nr 1 eWG-DDP)

Question 1-A: Taking into consideration that Codex Standards for DDP (i.e., apricots, dates, raisins and pistachio nuts) were developed in the early 80s, does the eWG identifies/justifies a specific need for actualization of such Standards as current versions would be considered to be insufficient to meet Codex objectives? In the case of an affirmative answer, please provide a justification.			
Brazil	Chile	Iran	Morocco
1A. Brazil is not a main producer and/or exporter of DDPs with Codex Standards. Nevertheless, due to their importance to international trade, we believe that revision and/or revocation is relevant not to influence trade negatively.	1A. Chile considers that some existing Codex standards on DDPs require a review to bring them in tune with current international trade practices, since these were established between 1981 (apricots, raisins and pistachio) and 1985 (dates).	1-A Iran feels that the current Codex standards for DDPs are in need of major revision in order to meet Codex objectives in this regard; this because we believe that the current standards do not adequately address the scale and nature of international trade in the target commodity group (DDPs).	1A. Due to old timeframe of some codex standards, and importance of international trade of some products, Morocco considers it necessary to review these standards, and think about new standards for other products. This is the case for dates and pistachios for instance.

Question 1-B: Based on the justification provided for Q.1-A, is the review of any of such Codex Standards needed? In that case, please nominate and/or rank which Standard(s) need revision.			
Brazil	Chile	Iran	Morocco
1-B Brazil does not have any ranking priority for revision and prefers to have a uniform general standard encompassing all DDPs.	1B. Chile believes that the Codex standards for RAISINS should be prioritized for revision taking into account its importance for the country. Chile will support the review for Pistachio Nuts and Dates if other members requests.	1-B Iran further believes that the Codex standards for the following commodities should be prioritized for revision in the following order of global importance in trade: Pistachio Nuts, Raisins and Dates.	1-B As for prioritization, Morocco thinks that dates and pistachios could be studied first, since they are important in international trade

<p>Question 2-A: Some DDP have the addition of ingredients like sugars or syrups (raisins, dates) or salt (pistachio nuts) while others refer only to the dried produce without any further processing or addition of ingredients (apricots). This could be the situation of many produce identified as “dried fruit” or “nuts” and may not present major difficulties to group them into a single standard for “dried fruits” or “nuts”. There may however be situations where the process applied and the ingredients used may result in a final product with distinctive characteristics from the products usually associated to “dried fruits” e.g. shredded or flaked coconut, dried fruit leather/rolls, etc.</p> <p>Based on the statement above and taking into consideration the different types of DDP presently on the market, besides the need to revise any of the current Codex Standard for DDP, could the eWG recommend grouping single Standards into two separate Standards? For example, one for Dried Fruits (apricots, dates and raisins) and another for Nuts (pistachio nuts).</p>			
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Brazil	Chile	Iran	Morocco
<p>2A. Brazil prefers to group all DDPs in one or more subgroups such as indicated in the question (i.e. dried fruits, nuts etc). We believe that this is in line with Codex Strategic Core Values as expressed in its 2014-2019 Strategic Plan “to ensure that the concepts of protecting the health of consumers and fair practise in the food trade are consistently followed in the Codex standard setting process”.</p>	<p>2A. Chile believes that in order to achieve the purpose to protect consumers against fraudulent practices, it is better to have separate Standards for each kind of product, and if needed, each standard should have Annexes with specific Standards for final/end products.</p>	<p>2-A Iran is also of the opinion that Codex objectives for the protection of consumers against misleading practices, are best served by revising the existing Codex standards in such a way that each commodity is treated separately, and that within each commodity, separate standards are established for the final/end-products (as results of processing), in accordance to the degree to which the end-product is substantially different in nature from the raw dried state of the commodity.</p>	<p>2A. To make life easier for consumers, producers, inspectors, ...,Morocco believes that it is more efficient to have separate standards for each kind of product,</p>

Question 2-B: In the case of an affirmative answer for Question 2-A, could the eWG:

- Identifies which possible product groupings would be prioritized in relation to their importance in international trade (i.e., nuts or dried fruits)? Please specify.
- Agrees to adopt pistachios as a framework for a Future Codex Standard for Nuts?

Or

Identifies what products (i.e., apricots, dates or raisins) would be adopted as a framework for a Future Codex Standard for Dried Fruits?

Question 2-C: In the case of a negative answer for Question 2-A, could the eWG identifies any major DDP currently being marketed in international trade and having a Codex Standard that could start future work in relation to the review of Codex Standards for DDP? Please specify (i.e., apricots, dates, pistachios or raisins).

Brazil	Chile	Iran	Morocco
<p>2-B Due to their relevance for international trade, Brazil identifies a general standard for dried nuts as the highest priority for the eWG.</p>	<p>2B. As mentioned before, Chile prioritizes Raisins but also supports the review for Pistachio Nuts and Dates Standards.</p> <p>Regarding the question of whether to use the standard for pistachio as a framework for Nuts, Chile would rather not to give an opinion by the moment until have a properly feedback from the Chile Nuts Industry.</p>	<p>2-B As was previously mentioned, for reasons of Iran being a leading producer and exporter of the following DDP commodities: Pistachio, Raisins and Dates; we believe that the three aforementioned commodities should be prioritized in relation to their relative importance in international trade. We further agree to adopt pistachio nuts as a framework DDP commodity for a revised Codex standard for Nuts.</p>	<p>2-B Considering the international trade figures, we propose to adopt pistachio nuts as a framework DDP commodity for a revised Codex standard for Nuts, and dates for dried fruits</p>

QUESTIONNAIRE Nr 2 eWG-DDP**CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CCPFV)****Foreword**

1. Continuing the intent of the electronic Working Group on Dry and Dried Produce (e-WG-DDP) and trying to facilitate the understanding, the responses received in reply to Questionnaire nr 1 are listed as a table in the Annex to this document.

2. To allow an assessment on whether to continue the work, the eWG-DDP is invited to evaluate the responses as provided and to decide on the ways to proceed by answering Questionnaire nr 2, taking into consideration the conclusions and recommendations of this document (paragraphs 8 and 9).

3. Not to overshadow discussion and ample participation, beside responses to conclusions and recommendations, any member is invited to supply and amend the table at the Annex with their own responses to the Questionnaire nr 1 until the end of this phase of the work (July 1st)⁵. The decision on whether engage the elaboration of a proposal Project Document, may also be postponed, after our validation step.

Assessment of the responses to Questionnaire nr 1

4. Most of the responses received outlined the need to revise current Codex Stans for DDPs. One member mentioned eventual revocation as an alternative to the use of outdated standards.

5. According to the responses received, most members preferred the revision of each (single) current Codex Stan of DDPs at a time. One expressed the idea to group similar products in a general standard.

6. No members expressed objection to grouping the standards in the future and to the use of a revised single Codex Standard as a frame. One member alerted that further processed DDPs should not be subject to standardization.

7. Concerning prioritization, members expressed the intent to support the revision of the Codex Standard for pistachio nuts and that the Codex Standards for dates and raisins should be prioritized as future work by the CCPFV. The Codex Stan for Apricots was not cited by any member.

Conclusions and recommendations

8. The number of responses reflects the interest on the subject by some of the main producers and exporters of DDPs and the conclusions presently submitted to the eWG for amendment and/or ratification, are:

- a) there was clear support to the revision of current Codex Stans for Pistachio nuts, dates and raisins;
- b) the development of a general Codex Standard for nuts and for dried fruits is premature for the time being, but not discarded for future debate and/or development;

9. In the light of the conclusions above, it is recommended that the eWG decides whether it wishes to support the revision of Codex Stan for Pistachio nuts and for dates and raisins and if the eWG may indicates a volunteer Government (and interested international organization(s)) to elaborate a proposal of Project Document for such intent.

Question 1: Taking into consideration the conclusions and recommendations of the document, does the eWG support the statements as presented in paragraph 8a and 8b?

Question 2: Does the eWG have any suggestion on how to deal with the Codex Stan for Apricots?

Question 3: Is there interest of any eWG Member to volunteer to elaborate a proposal of Project Document for the revision of the Codex Stan for Pistachio nuts, Dates and/or Raisins (please list any if so)?

⁵ For later submissions the timeline may need to be revised accordingly.

**CONCLUSIONS TO THE FIRST ROUND OF COMMENTS AND REVISED TIMELINE TO THE ELECTRONIC WORKING GROUP ON DRY AND DRIED PRODUCE (eWG-DDP)
CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CCPFV)**

Foreword

1. The conclusions to the First Round of Comments to the eWG-DDP as presented is provided after revising the responses of Questionnaire nr 1 (responses from Brazil, Chile, Iran and Morocco) and Questionnaire nr 2 (responses from Brazil, Chile and Iran).
2. Taking into consideration that one Member of the eWG-DDP volunteered to coordinate the revision of the Codex Stan for Pistachio nuts and Dates, we are continuing the work and proposing at the end of the document a revised timeline for the second round of comments of the eWG.
3. The second round of comments will try to validate the need to revise those Codex Stan, identifying those provisions that are outdated and/or need revision.

Assessment of the responses to Questionnaire nr 1

4. Most of the responses received outlined the need to revise current Codex Stans for DDPs and preferred the revision of each (single) current Codex Stan of DDPs at a time.
5. Members also expressed the intent to support the revision of the Codex Standard for pistachio nuts and that the Codex Standards for dates and raisins should be prioritized as future work by the CCPFV.

Assessment of the responses to Questionnaire nr 2

6. Most of the responses received agreed to the conclusions of Paragraphs 8a and 8b of Questionnaire nr 1, which states: "there was a clear support at the eWG-DDP to the revision of current Codex Stans for Pistachio nuts, dates and raisins as individual standards. Nonetheless, the development of a general Codex Standard for nuts and for dried fruits was not discarded for future debate and/or development".
7. There was an offering to the elaboration of both Project Documents to the revision of the Codex Stan for Pistachio nuts and to the revision of the Codex Stan for Dates.

Conclusions and recommendations

8. According to the responses received on the first round of comments, there is support to the revision of the Codex Stan for Pistachio nuts and the Codex Stan for Dates as individual standards. One member of the eWG volunteered to prepare the corresponding Project Documents for such intent.
9. The Codex Stan for Raisins received support to the revision, but no member of the eWG volunteered to prepare a Project Document.
10. The Codex Stan for Apricots did not receive any remark along the first round of comments.
11. There was no support to the development of a general Codex Standard for nuts and for dried fruits, though not discarded for future debate and/or development.
12. In light of the preceding conclusions and the mandate of the eWG-DDP, the second round of comments will focus on the individual Codex Stan of Pistachio and Dates, to evaluate provisions of remaining dry and dried products standards that might need revision.

CONCLUSIONS TO THE VALIDATION STEP AND REVISED TIMELINE TO THE ELECTRONIC WORKING GROUP ON DRY AND DRIED PRODUCE (eWG-DDP)

CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CCPFV)

Foreword

1. The validation step comprised of a five sets of questionnaires that were elaborated and put available online at www.surveymonkey.com. The number of respondents varied among product/standards evaluated. The conclusions to the validation step as presented is provided after revising the responses of the questionnaires and the identification of the respondents is relied anonymous. Nonetheless, due to the restricted number of participants of the eWG as well as for the respondents, the outcome of the work is not to be relied as statistically proven.

2. Taking into consideration the terms of reference of the eWG-DDP, the second round of comments tried to validate the need to revise the Codex Stan for Pistachio nuts, Dates and Raisins, identifying those provisions that are outdated and/or need revision.

3. The eWG Members are encouraged to comment both on the assessments and, mostly, on the conclusions of the eWG-DDP, that will be part of the final document to be provided to the Committee on Processed Fruits and Vegetables on its 28th Session to assist in its future decisions on work priorities.

Assessment of the responses to evaluate provisions of the Codex Stan for Pistachio nuts that might need revision - CODEX STANDARD FOR PISTACHIO NUTS (CODEX STAN 131-1981)

4. The responses to the part 1 of the survey for Pistachio nuts (Sections 1 to 3.3.2) may be accessed at <https://pt.surveymonkey.com/results/SM-F3LLWSZJ/> and to the Part 2 of the survey (Sections 3.3.3 to 6) at <https://pt.surveymonkey.com/results/SM-5JNXRSZJ/>

5. Most of the responses received outlined the need to revise current Codex Standard for Pistachio Nuts.

6. Half of the respondents identified the need of technical or complete revision of the majority of the Sections, namely Sections 1 (Scope), 2.1 (Product definition), 2.3 (Styles), 2.4 (Sub-styles), 2.5 (Size classification), 3.1 (Raw material), 3.3.1 (Composition - Moisture Content), 3.3.2 (Quality Factors - General Requirements).

7. There were ample support to change, at least technically, Sections 3.3.4 (Allowances for Defects), 3.4 (Lot Acceptance) and 6 (Weights and measures)

8. The group was less inclined to change only Sections 2.2 (Varietal Types), 3.2 (Optional ingredients) and 3.3.3 (definition of defects).

Assessment of the responses to evaluate provisions of the Codex Stan for Dates that might need revision - CODEX STANDARD FOR DATES (CODEX STAN 143-1985)

9. The responses to the part 1 of the survey for Dates (Sections 1 to 3.2.3) may be accessed at <https://pt.surveymonkey.com/results/SM-JDLKBZZJ/> and to the Part 2 of the survey (Sections 3.3.3 to 6) at <https://pt.surveymonkey.com/results/SM-S9DLPZZJ/>.

10. Most of the responses received fully support to keep all the provisions of the current Codex Standard for Dates as currently stated.

11. There was less support to keep the Standard as it is for Sections 2.1 (Product Definition), 2.2 (Varietal Types), 3.2.1 (General Requirements), 3.2.3 (Allowance for Defects), 3.3 (Lot Acceptance) and 6 (Weights and Measures).

12. For those Sections, despite half of the respondents have chosen to keep the text as it is, there were another half inclined to have technical changes to Sections 2.1 (Product Definition), 2.2, (Varietal Types), 3.2.1 (General Requirements), 3.3 (Lot Acceptance) and 6 (Weights and Measures).

13. Only Sections 2.2 (Varietal Types) and 3.2.3 (Allowance for Defects) received suggestions to be completely revised.

Assessment of the responses to evaluate provisions of the Codex Stan for Raisins that might need revision - CODEX STANDARD FOR RAISINS (CODEX STAN 67-1981)

14. The responses to the survey for Raisins may be accessed at <https://pt.surveymonkey.com/results/SM-82BVJ5ZJ/>

15. There was an equilibrium between responses with a slight tendency to support the revision of the Standard.

16. More than half of the respondents identified the need of technical or complete revision of Sections 2.3 (Styles or Forms), 3.1 (Permitted Ingredients), 3.2.1 (Maturity Characteristics), 3.2.2 (Minimum Quality Requirements) and 3.2.4 (Allowances for Defects).

17. More than half of the respondents did not support to change Sections 1 (Scope), 2.1 (Product Definition), 2.2 (Type Groups) and 3.2.3 (Definitions of Defects).

Conclusions and recommendations

18. According to the responses received, the support to revise Codex Standards for Pistachio nuts, Dates and Raisins may be justified as the respondents of the questionnaires could detect many Sections as outdated and/or relevant to revision.

19. Such awareness was clearer for the Codex Stan for Pistachio nuts and Raisins and less clear for the Codex Stan for Dates.

20. In addition, most of the Sections with wording not currently adopted for the elaboration of Standards by the Committee on Processed Fruits and Vegetables were identified as changeable/removable for the three Codex Standards evaluated, namely Sections related with ingredients/raw material, Allowances for defects, Lot acceptance and Weights and measures.

21. For the English version of the Codex Stan of Raisins one member have detected an inconsistency in Section 2.3 Styles (or Forms) "a" and "b", as the definitions adopted do not match the titles.

22. In light of current and preceding conclusions and the mandate of the eWG-DDP, the Working Group may recommend:

a) Full revision of the Codex Standards for Pistachio nuts, Raisins and Dates, in that order of priority; or

b1) The revision of Sections 1 (Scope), 2.1 (Product definition), 2.3 (Styles), 2.4 (Sub-styles), 2.5 (Size classification), 3.1 (Raw material), 3.3.1 (Composition - Moisture Content), 3.3.2 (Quality Factors - General Requirements), 3.3.4 (Allowances for Defects), 3.4 (Lot Acceptance) and 6 (Weights and measures) of the Codex Standards for Pistachio nuts;

b2) The revision of Sections 1 (Scope), 2.1 (Product Definition), 2.2 (Type Groups), 2.3 (Styles or Forms), 3.1 (Permitted Ingredients), 3.2.1 (Maturity Characteristics), 3.2.2 (Minimum Quality Requirements), 3.2.3 (Definitions of Defects) and 3.2.4 (Allowances for Defects) of the Codex Standards for Raisins.

b3) The revision of Sections 2.1 (Product Definition), 2.2, (Varietal Types), 3.2.1 (General Requirements), 3.2.3 (Allowance for Defects), 3.3 (Lot Acceptance) and 6 (Weights and Measures) of the Codex Standards for Dates.

23. The eWG is encouraged to comment on the alternatives as presented on paragraph nr 22 and/or combine alternatives as appropriate. The deadline to submit comments is 26 of January 2016.

COMMENTS FROM IRAN

With regards to the conclusions to the validation step and revised timeline to the Electronic Working Group on Dry and Dried produce of the Codex Committee on Processed Fruits and Vegetables (CCPFV), please note the following suggestions:

Iran choose full revision of pistachio nuts the current codex standard for pistachio nuts (Codex Stan 131-1981). So Iran suggests a new revision of standard that comply with two addendums (general & specific) for pistachio nuts that you may please find in attached PDF file.

CODEX STANDARD FOR OPEN INSHELL PISTACHIO NUTS

CODEX STAN ...

1. SCOPE

This standard applies to open inshell pistachios from varieties of *Pistacia vera* L. either in natural or in processed condition and which are offered for direct consumption. It also covers open inshell pistachios which are packed in bulk containers and which are intended for repacking in consumer size containers. Open inshell pistachios shall be presented as either a "Commercial Consignment", or as a "Ready-To-Eat" Product.

2. DESCRIPTION

2.1 Product Definition

Pistachios are the product obtained from mature seeds from the fruit of *Pistacia vera* L. which have been dried and naturally or mechanically opened. The product may be in raw or roasted form.

2.1.1 Ready-To-Eat pistachio nut consignment: Describes nuts that do not need to undergo any additional processing or treatment before final consumption.

2.1.2 Commercial pistachio nut consignment: Describes nuts that are not defined as Ready-To-Eat.

2.2 Varietal Type

Varietal types are classified as:

- (a) Long pistachio: Ratio of length to largest diameter should be greater than 1.50
- (b) Round pistachio: Ratio of length to largest diameter should be equal to, or less than 1.50

2.3 Styles

The product shall be presented in one of the following styles:

- (a) Raw pistachios: are defined as pistachio nuts that are hulled, washed and dried, and which have not been subject to any other processes.
- (b) Roasted pistachios: are pistachio nuts that have been subject to roasting.

2.4 Size Classification

Pistachios may be designated as to size in accordance with the following Table:

No. of Pistachios per Ounce	No. of Pistachios per 100 Grams
Over 32	Over 113
30 to 32	104-113
27 to 29	94-103
24 to 26	84-93
21 to 23	74-83
Under 21	Under 74

2.5 Kernel Content (Meat Content)

The percentage weight ratio of pistachio kernel to the open inshell nut is called "Kernel Content". Numerical measurement indicators of Kernel Content (also referred to as "Meat Content") should be rounded and specified to the closest integer figure.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS IN THE FINAL PRODUCT

3.1 Composition - Moisture Content

Maximum moisture content 5% m/m.

3.2 Quality Factors - General Requirements

- (a) Practically free from off-odor or abnormal taste.
- (b) Free from living insects and mites.
- (c) Practically free from foreign matter - anything other than pistachio nuts (kernel, hard shell and attached pericarp)

3.3 Definition of Defects

- (a) Closedness (unsplit) - pistachio nuts whose shells are not split open, but contain a fully developed kernel;
- (b) Emptiness - the condition of a pistachio nut in which the kernel has not developed;
- (c) Unripeness (immaturity) - the condition of a pistachio nut in which the kernel has not developed adequately;
- (d) Insect damaged nuts - nuts that are affected by insect damage or contain dead insects, mites, or other pests.
- (e) Mouldy nuts - nuts that are affected by mould or decay, to a visible extent.
- (f) Foreign matter - Anything other than pistachio nuts including: leaves, sticks, hull fragments, dirt and stones.

3.4 Allowances for Defects

The maximum allowances by count for defects as defined in section 3.3 are as follows:

Category 3.3(a) - 5%

Category 3.3(b) - 5%

Category 3.3(c) - 8%

Category 3.3(d) - 4%

Category 3.3(e) - 1%

Category 3.3(f) - 0.6%

Total defects (a) to (f) shall not exceed 10%.

3.5 Lot Description

A lot will be considered as meeting the quality criteria requirements of this standard when the sub-samples as taken in accordance with an appropriate sampling plan with an AQL of 6.5, (see relevant Codex texts on methods of analysis and sampling), meet the general requirements for sub-sections 3.1 and 3.2 and do not exceed the allowances for the respective defects in sub-section 3.4.

6. WEIGHTS AND MEASURES

Containers shall be as full as practicable without impairment of quality and shall be consistent with a proper declaration of contents for the product.

General Addendum to Iran's Comments for the Revision of the Codex Standard: CODEX STAN 131-1981 for Unshelled (In-shell) Pistachio Nuts

This is a technical proposal with respect to pistachio product commodities being traded on a commercial scale at an international level.

The three Pistachio nut commodity subcategories listed here below had a combined estimated **total annual market value of about 570 million dollars US in 2015**, this, as traded on the global food commodity markets.

It seems imperative that a set of separate individual Codex standards should be prepared for each of the three Pistachio nut commodity subcategories mentioned here below. The three proposed standards should be prepared with the input of the pistachio nut industry representatives from the major exporting and importing nations concerned.

- 1) **Closed-shell pistachios** in the amount of about **32,000 metric tons**;
- 2) **Pistachio kernels** in the amount of about **15,000 metric tons**;
- 3) **"Green Peeled Pistachio Kernel" (GPPK)** in the amount of about **3,000 metric tons**;

References:

- 1) Iran Pistachio Association <http://iranpistachio.org/en/>
- 2) International Nut and Dried Fruit Council <http://www.nutfruit.org/>
- 3) The Customs Administration of the Islamic Republic of Iran
<http://www.irica.gov.ir/Portal/Home/Default.aspx?CategoryID=68bde3d2-c2d5-411f-a8b8-2b50ce202c04#>

**Specific Addendum to Iran's Comments for the Revision of the Codex Standard:
CODEX STAN 131-1981 for Unshelled (In-shell) Pistachio Nuts**

As per the instructions set forth in the document sent by the Codex Secretariat to the CCPFV eWG-DDP, named: "Evaluation I of Codex Standards of dry and dried products (part 1)", document reference: "Round II_QUEST Nr 1a 19082015"; Iran's amendment proposals, technical comments and suggestions to the listed Sections of Codex Stan for Unshelled (In-shell) Pistachio nuts of this questionnaire, as well as technically related labeling provisions are provided here below:

- 1- With reference to section 5.3 (**Hygiene**) of the standard, the following change is strongly recommended, so as to make clear the distinction between "ready-to-eat" product, and product intended as a "Commercial Consignment":

"When tested by appropriate methods of sampling and examination, the product, if presented as "ready-to-eat" .

- 2- With reference to sections 7.1.1, 7.1.2 and 7.1.3 (**Labelling**); the following changes to the text are deemed necessary:

"7.1.1 The name of the product as declared on the label shall be **"open inshell pistachios"** or **"open inshell pistachio nuts"**."

"7.1.2 In addition, there shall appear on the label as part of the name or in close proximity to the name; the **consignment type as "Commercial Consignment" or "Ready-To-Eat Product"**, and the **style of pistachio as "Raw" or "Roasted"**."

"7.1.3 The name of the product shall include the varietal types as "long" or "round", the size designation as **the number of pistachios per Ounce, or per 100 grams as specified in section 2.4 (Size Classification); and the "Kernel Content" shall be specified as an integer percentage.**"

- 3- With reference to section 4 (**Food Additives**); the following change to the text is deemed necessary:

Given that existing/current Codex standards have not specified the permitted levels of natural additives for use on pistachio nuts, this section (Food Additives) is not applicable to this particular standard.

For dates, Iran's suggestion is revision of the Codex Standard for Dates (CODEX STAN 143-1985), Section 2.2. Varietal Types: Iran suggests the following varieties to be added in invert sugar varieties: Mozafati, Peyarom, Kabkab.

COMMENTS FROM THE US

The U.S. is of the view that the findings of the e-WG is incomplete because some important information that provide an insight to CCPFV member countries and other interested parties on how the working group arrived at its conclusions is missing.; namely-

1. The names of the existing CCPFV Dry and Dried Produce standards that were evaluated.
2. Whether other Codex Standard such as the Codex Standard for Peanuts should be included in the review - (para 111 of the 27th CCPFV report).
3. Annexes with the copy of the questions asked during the first e-WG consultation and a summary of the responses tallied in a simplified format, also members of the working group.;
4. Whether the e-WG reviewed ongoing or recent UNECE standardization work on the same D&DP bearing in mind the following - since some delegations at the 27th CCPFV session had concerns about the duplication of work in the dried produce area with the UNECE. (para 110 of the 27th CCPFV report)
5. The identification of critical issues or areas in the international D&DP trade that are not being currently addressed by the existing Codex D&DP standards.

RESPONSE TO THE COMMENTS RECEIVED

Dear E-WG Members,

We would like to inform that we have received comments and suggestions from Iran and the US (attached pdf files) to the Draft Final Conclusions of the electronic Working Group on Dry and Dried Fruits and Vegetables.

According to the comments, we would like to point below the mandate of the eWG as described in Paragraph 114 of the Report of the 27th CCPFV:

114. Based on the above considerations, the Committee agreed to establish an electronic working group, chaired by Brazil and working in English only, to reassess conclusions of the discussion paper and evaluate provisions of remaining dry and dried products standards that might need revision. The conclusions and recommendations of the discussion paper would provide information to the Committee to assist in future decisions on work priorities.

Taking that into consideration we would like to inform that the eWG may not propose any new work to the CCPFV, if any Member of the eWG intend to revise any Codex Standard a Project Document shall be provided to the next Session of CCPFV.

Close to the same issue, regarding the identification of critical issues not addressed by the existing Codex D&DP standards, it is also out of the scope of the eWG. Nonetheless it is our feeling that such identification should be better addressed in an eventual Project Document for any of the discussed DDP Codex Stan (or new product to be presented).

Finally, the eWG did not discuss other international DDP Standards as they were out of the scope of the eWG, other products and approaches were discussed and such discussions we now have incorporated at the report.

Based on the suggestions received we revised the Draft Conclusions and are recirculating it to a new round of comments until 7th of March, 2016.

Please, while submitting further comments, share them to all the listed members as highlighted below.

We also appreciate if suggestions/corrections to the text and/or List of Participants be inserted in the draft text as provided.

FINAL COMMENTS IRAN

Iran thanks the leadership of this working group for your helpful guidance as provided in your e-mail message of February 26th, 2016 with regard to the correct procedure for proposing new work to the CCPFV. In particular with reference to possible new standards for pistachio nut products. We shall pursue the course of action you have kindly recommended.

Iran would like to take this opportunity to reiterate our understanding that our proposed changes to the current Codex Standard for Unshelled Pistachio Nuts (CODEX STAN 131-1981), as put forward in the main body of our proposed revised text, would be more substantive, if considered as a whole with the contents of the "Specific Comments Addendum" as submitted to this working group in our e-mail response of February 23rd, 2016.

With thanks for your attention to and consideration of this final comment from Iran.

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