COMMENTS ON THE PROPOSED DRAFT GENERAL STANDARD FOR DRIED FRUITS
(Comments submitted by Australia, Egypt, Iran, Iraq, Malaysia, Thailand, United States of America and Organisation Internationale de la Vigne et du Vin (OIV), Collagen Casings Trade Association (CCTA))

BACKGROUND
This document compiles the comments on the proposed draft general standard for dried fruits to at Step 3 of the Procedure, submitted through the Codex Online Commenting Systems (OCS). The comments are as shown in the Appendix.

The Online Commenting System (OCS) is an online tool that enables contact points to submit comments on draft texts in a standardised way thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

EXPLANATORY NOTES ON THE APPENDIX
Structure of Comments
The Comments submitted have been presented in a table format, with each Table divided into the following two Columns as follows:

First Column – Provides the proposed changes made by contact points on the text, and is divided into general comments and comments specific to a paragraph.

Second Column – Provides its author and the rationale (explanation) of the comment. For general comments, only the author of the comment is included.
## COMMENTS ON THE PROPOSED DRAFT GENERAL STANDARD FOR DRIED FRUITS

<table>
<thead>
<tr>
<th>General Comments</th>
<th>Members or observers</th>
</tr>
</thead>
<tbody>
<tr>
<td>we have no comments about proposed draft so we agree with proposed.</td>
<td>Iraq</td>
</tr>
</tbody>
</table>

### Specific comments

<table>
<thead>
<tr>
<th>Title</th>
<th>Members or observers/Rational</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROPOSED DRAFT GENERAL STANDARD FOR DRIED FRUITS</td>
<td>Australia</td>
</tr>
<tr>
<td></td>
<td>It is appreciated to be able to make comments relating specifically to the sections relating to food additives in the draft standards, especially to make them relevant to future alignment of any food additive provisions in these standards with the GSFA. The CCFA Information document Guidance to Commodity Committees on the Alignment of Food Additive Provisions <a href="http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CC">http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CC</a> FA_e_01.pdf, provides useful background information as well as specific minimum requirements for active Commodity Committees, such as CCPFV relating to alignment. This relates to updating the food additive requirements in Commodity standards as well as developing new standards. The suggested requirements are provided in para 11 of the document. If CCPFV are able to do more than the minimum that would obviously be of considerable benefit. Such additional assistance would be considering what proposed amendments to Tables 1, 2 and 3 of the GSFA due to the draft Standards would be. There seemed to be editing issues in the documents. Use of ( ) and [ ] when not needed. It is assumed that these are mistakes and will be fixed when the drafts are finalised. Specific comments have been provided</td>
</tr>
</tbody>
</table>

### 1. Scope

This Standard applies to dried fruits, as defined in Section 2 below and in the corresponding Annexes and offered for direct consumption, including for catering purposes or for repackaging if required. It does not apply to the product when indicated as being intended for further processing.

Malaysia

Malaysia supports this sentence (for further processing) without change.

USA

Based on trade practices, dried fruit have dual uses- direct consumption and/or further processing into an ingredient for pastries and confections. In trade, both uses have the same quality requirements. The exclusion should be "industrial processing."

### 2.1 Product Definition
prepared from substantially sound fruits reasonably mature, sufficiently developed or ripe fruits, according to type of dried fruits and as defined in the corresponding Annexes;

Iran

The phrase "Dried fruits being prepared by frying are excluded" transfer from clause (3) to clause (2) as below:

(2) processed by drying either by the sun or by other recognized methods of drying and or dehydration into a form of marketable dried, with or without sweetening solution and may be coated with one or more of the ingredients as defined in Section 3. Products, Dried fruits being prepared by frying are excluded and in the corresponding Annexes

- "Treated Dried Fruits" - Products processed by drying and undergone processing treated with preservatives or preserved by other means, before or after drying (e.g. salting, sugaring, flavouring). The products may be treated with preservatives or preserved by other means (e.g. pasteurization).

USA

The standard should exclude product treatments that alter the normal taste characteristic of the product or changes the product from dried fruit a confection.

2.3 Species and Varietal Types

Example - Non Exhaustive list of species, examples of fruits covered by this standard - common and scientific names, /Scientific’s name of fruit covered by this standard are listed in the Table below.

USA

It should be indicated that the list is non exhaustive in case there are new fruits being discovered or developed or new driving methods developed and applied to fruits that were not previously dried. It also avoids the possibility of discriminating against fruits that were not mentioned in the list.

Example of species /Scientific’s name of fruit covered by this standard are listed in the Table below.

Vaccinium myrtillus L.

CCTA

Litchi chinensis Sonn.

CCTA

3.1.2 Optional Ingredients

In accordance with the relevant provisions in the corresponding Annexes. Optional ingredients for dried fruits other than those specified in corresponding Annexes may include, but is not limited to:

Thailand

We consider that the list of optional ingredients is necessary for dried fruits in general and suggest that square brackets on this Section should be removed. Consequently, Sections 2.1.2 Optional Ingredients of Annex on Dried Apricots, Raisins and Dried Persimmons should be deleted to avoid redundant.

In accordance with the relevant provisions in the corresponding Annexes. Optional ingredients for dried fruits other than those specified in corresponding Annexes may include, but is not limited to:

Thailand

see comment in Section 3.1.2.

In accordance with the relevant provisions, addition to those specified in the corresponding Annexes - Optional, optional ingredients for dried fruits other than those specified in corresponding Annexes may include, but is not limited to:

Malaysia

Malaysia proposes this sentence to be reworded as follow: "In addition to those specified in corresponding Annexes, optional ingredients for dried fruits may include, but is not limited to:"

USA

In accordance with the relevant provisions in the corresponding Annexes. Optional ingredients for dried fruits other than are limited to those specified in corresponding Annexes may be used as processing aids which include, but is not limited to:

Thailand

see comment in Section 3.1.2.

(1) Sugars and/or other foodstuffs with sweetening properties such as honey as defined in the Standards for Sugars (CXS 212-1999) and Honey (CXS 12-1981) respectively;

Thailand

see comment in Section 3.1.2.
3.2.2 Moisture Content and Water Activity (a_w)

Dried fruits shall comply with the maximum moisture content as defined in the corresponding Annexes. Dried fruits other than those specified in corresponding Annexes shall be sufficiently dried and have water activity (a_w) ≤ 0.65.

USA

CCPFV standards only have a minimum and maximum moisture content and this practice should be maintained.

3.2.5.1 Definition of Defects

Visible damage or contamination caused by insects, mites, rodents or other animal pests, including the presence of dead insects and/or mites and their debris or excreta.

Thailand

Our concern is on the tolerances allowed for “Damage caused by pest” in Dried Apricots and Dates which are quite high. “Damage caused by pest” by its definition includes both visible damage and contamination caused by insects, mites, rodents or other animal pest, including the presence of dead insects and/or mites and their debris or excreta which can cause an adverse health effect. We would, therefore, like to propose to amend the definition of “Damage caused by pest” by deleting the issue on contaminations which are already defined in Section 3.2.3 (4) of the main text. The amended definitions would then read as follows:

“Defect Definition

Damage caused by pests – Visible damage caused by insects, mites, rodents or other animal pests.”

Consequently, the amended definition for “Damage caused by pests” should be replaced the definitions of “Damage caused by pests” defined in Section 2.2.4 of an Annex on Dried Apricots and Section 2.2.3 of an Annex on Dates.

4. FOOD ADDITIVES

| (2) | Flour (e.g., rice flour, corn flour); | Thailand |
|     | see comment in Section 3.1.2. |
| (3) | Edible vegetable oils; |
| (4) | Spices and culinary herbs and/or their extracts¹; |
| (4) | Spices and culinary herbs and/or their extracts¹; | USA |
|      | The optional ingredients from 4-7 makes the dried fruit into a confectionary condiment or preserve, which is not part of the scope; therefore, they should be deleted. |
| (5) | Chocolate, and other edible stuffing material; | Thailand |
|      | see comment in Section 3.1.2. |
| (5) | Chocolate, and other edible stuffing material; | USA |
| (6) | Salt as defined in the Standard for food Grade Salt (CXS 150-1985); | Thailand |
|      | see comment in Section 3.1.2. |
| (6) | Salt as defined in the Standard for food Grade Salt (CXS 150-1985); | USA |
| (7) | Fruit juice. | Thailand |
|      | see comment in Section 3.1.2. |
| (7) | Fruit juice. | Malaysia |
|      | Malaysia appreciates if could give more information for the use of fruit juice in dried fruit. |
| (7) | Fruit juice. | USA |

USA

3.2.2 Moisture Content and Water Activity (a_w)

Dried fruits shall comply with the maximum moisture content as defined in the corresponding Annexes. Dried fruits other than those specified in corresponding Annexes shall be sufficiently dried and have water activity (a_w) ≤ 0.65.

USA

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4. FOOD ADDITIVES
### 4. FOOD ADDITIVES (optional)

<table>
<thead>
<tr>
<th>Country</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thailand</td>
<td>We propose to deleted the term optional from the title to be in line with the format used in Codex Committee on Processed Fruits and Vegetables.</td>
</tr>
<tr>
<td>Australia</td>
<td>Suggest not optional, but needed</td>
</tr>
<tr>
<td>Egypt</td>
<td>Egypt considers to “General standards for food additives CODEX STAN 192-1995” (canned fruits).</td>
</tr>
<tr>
<td>Thailand</td>
<td>We propose that the square brackets on this Section should be removed as this Section is in line with the template laid down in the Procedural Manual and containing a limited list of functional classes of food additives that GSFA allows for used in dried fruits which are fall under food categories 04.1.2.2 and 04.1.2.7.</td>
</tr>
<tr>
<td>Australia</td>
<td>Put the list in alphabetical order, and plural</td>
</tr>
<tr>
<td>USA</td>
<td>The US believes that the standards should only include dried fruits without any optional ingredients (sugar, chocolate, stuffing or glazing, etc). The only food additives allowed should be color retention agents such as S02.</td>
</tr>
<tr>
<td>Australia</td>
<td>ANNEX A ON DRIED APRICOTS</td>
</tr>
<tr>
<td>Egypt</td>
<td>Egypt prefers to include an item for optional ingredients</td>
</tr>
<tr>
<td>Thailand</td>
<td>see comment in Section 3.1.2.</td>
</tr>
<tr>
<td>Malaysia</td>
<td>Malaysia is of the view optional ingredient in this individual annexes could be deleted as all the optional ingredients has been listed in Section 3.1.2 of Proposed Draft of General Standard For Dried Fruit.</td>
</tr>
<tr>
<td>Thailand</td>
<td>see comment in Section 3.1.2.</td>
</tr>
<tr>
<td>Egypt</td>
<td>Egypt prefers to include an item for optional ingredients</td>
</tr>
<tr>
<td>Thailand</td>
<td>see comment in Section 3.1.2.</td>
</tr>
</tbody>
</table>

#### 4.1 Acidity Regulators, Preservatives, Sweetener, Colour, Glazing agent, Antioxidant and Sequestrants

Food additives used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) and 04.1.2.7 (Candied fruit) or listed in Table 3 of the *General Standard for Food Additives* (GSFA, CXS 192-1995) are acceptable for use in foods conforming to this Standard.

<table>
<thead>
<tr>
<th>Country</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thailand</td>
<td>We propose that the square brackets on this Section should be removed as this Section is in line with the template laid down in the Procedural Manual and containing a limited list of functional classes of food additives that GSFA allows for used in dried fruits which are fall under food categories 04.1.2.2 and 04.1.2.7.</td>
</tr>
<tr>
<td>Australia</td>
<td>Put the list in alphabetical order, and plural</td>
</tr>
<tr>
<td>USA</td>
<td>The US believes that the standards should only include dried fruits without any optional ingredients (sugar, chocolate, stuffing or glazing, etc). The only food additives allowed should be color retention agents such as S02.</td>
</tr>
</tbody>
</table>

#### 4.2 Flavourings used in products covered by this Standard

Shall comply with the *Guidelines for the Use of Flavourings* (CXG 66-2008).

### ANNEX A ON DRIED APRICOTS

**[2.1.2 Optional Ingredients]**

- **Egypt**
  - Egypt prefers to include an item for optional ingredients

**[2.1.2 Optional Ingredients]**

- **Thailand**
  - see comment in Section 3.1.2.

**[2.1.2 Optional Ingredients]**

- **Malaysia**
  - Malaysia is of the view optional ingredient in this individual annexes could be deleted as all the optional ingredients has been listed in Section 3.1.2 of Proposed Draft of General Standard For Dried Fruit.

#### 2.2.1 Moisture Content
**Untreated dried apricots** shall have a moisture not more than 25% (by mass);

**Dried apricots treated with preservatives by other means (e.g. pasteurization)** shall have a moisture content betweenAbove 25.0 % (by mass) and not exceeding 40.0 % (by mass) for dried apricots and shall be labelled as high moisture or equivalent denomination.

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### Uniformity

2.2.2 Generally uniform in size within any count category, where declared.

USA

This should be placed after the sizing requirements since it pertains to the sizing tables.

2.2.2.1 Generally uniform in size within any count category, where declared.

USA

This should be placed after the sizing requirements since it pertains to the sizing tables.

(2) By diameter:

USA

This should be placed after the sizing requirements since it pertains to the sizing tables.

#### Thailand

We consider that size codes in the table need to be adjusted to avoid overlaps.

---

### Definition of Defects

Damage caused by pests: Visible damage or contamination caused by insects, mites, rodents or other animal pests, including the presence of dead insects and/or mites and their debris or excreta.

Thailand

See comment on Section 3.2.5.1 of the main text.

---

### Foreign matter and extraneous vegetable materials except pits, pit fragments in pitted fruit (by mass)

Thailand

In view of the fact that the severity of an adverse health effect consequential to foreign matter is different from extraneous vegetable material. Also, Section 3.2.3 of the main text states that dried fruits should be practically free of any visible foreign matter. Therefore, we propose to delete foreign matter from 2.1. The amended 2.1 would then read as follows:

"2.1 Extraneous vegetable material except pits, pit fragments in pitted fruit (by mass)."

---

### Food Additives

[Preservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) or listed in Table 3 of the General Standard are acceptable for use in foods conforming to this Standard.]

Australia

Table 3 _ The 8 preservatives in Table 3 are acceptable for use in these products?

Same comment raised for other annexes

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### ANNEX ON DATES

In addition to the general provisions applicable to dried fruits whole pitted and unpitted dates in their natural state, the following specific provisions apply:

USA

For clarification, the standards should be limited to whole dates pitted and unpitted dates.

---

### Styles

**Whole:** may be unpitted or pitted. May be classified as sub-styles as follows:

**Pitted and capped:**

USA

Capped is not mentioned or explained anywhere else in the standard.

---

### Optional Ingredients

[2.1.2 Optional Ingredients](#)

**Thailand**

See comment in Section 3.1.2.

[2.1.2 Optional Ingredients](#)

**Malaysia**

Malaysia is of the view optional ingredient in this individual annexes could be deleted.
<table>
<thead>
<tr>
<th>Section</th>
<th>Text</th>
</tr>
</thead>
</table>
| 2.2.2.1 | (1) Unpitted dates  
Thailand  
Size code 1 and size code 2 need to be reviewed to avoid gaps. |
| 2.2.2.1 | (2) Pitted dates  
Thailand  
Size code 1 and size code 2 need to be reviewed to avoid gaps. |
| 2.2.3 | (5) Damage caused by pests: Visible damage or contamination caused by insects, mites, rodents or other animal pests, including the presence of dead insects and/or mites and their debris or excreta.”  
Thailand  
See comment on Section 3.2.5.1 of the main text. |
| 2.2.4 | Defects and Allowances  
Malaysia  
Notes some of definition defect are not described under this Section. |
| 3.1.1 | The name of the product shall be “Dates” or optionally “Dates coated with Glucose Syrup”.  
USA  
it is not customary for the coating to be part of the product’s name, so this should be optional. |
| 4. | FOOD ADDITIVES  
Malaysia  
Notes CXS 143-1985 Standard for Dates is referring to F.C. 4.1.1.2 of GSFA.  
USA  
For consistency with other Codex standards, we recommend using food additives instead of preservatives |

ANNEX ON RAISINS

1.1 Product Definition  
prepared from fruits or bunch of berries of the varieties conforming to the characteristics of Vitis vinifera L. (but excluding currant types).  
USA
processed by drying in an appropriate manner into a form of marketable raisin with or without coating. There are no optional ingredients in raisins.

**2.1.2 Optional Ingredients**

**Malaysia**
Malaysia is of the view optional ingredient in this individual annexes could be deleted as all the optional ingredients has been listed in Section 3.1.2 of Proposed Draft of General Standard For Dried Fruit.

**With suitable optional ingredients.**

**2.1.2 Optional Ingredients**

(1). Flour (e.g., rice flour, corn flour);
(2). Edible vegetable oils.

**2.2.1 Moisture Content**

**Organisation internationale de la vigne et du vin**
In OIV resolution OIV-VITI 493-2013 specifications of Moisture content are

- Malaga Muscatel type treated with preservatives or preserved by other means [34-35]
- “Ready to use” dried grapes 25%
- All other styles and/or types 18%

**2.2.3 Definitions of Defects**

(ii) are completely shriveled with practically no flesh, and

**Table 1: Seedless**

<table>
<thead>
<tr>
<th>Defect</th>
<th>Tolerance for defective fruits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seedless</td>
<td>5</td>
</tr>
<tr>
<td>Seed bearing</td>
<td>8</td>
</tr>
<tr>
<td>Mouldy</td>
<td>4</td>
</tr>
</tbody>
</table>

**Table 2: Seed bearing**

<table>
<thead>
<tr>
<th>Defect</th>
<th>Tolerance for defective fruits</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Undeveloped berries</td>
<td>63</td>
</tr>
<tr>
<td>1.2 Damage by pests, sunburn, mechanical damage</td>
<td>63</td>
</tr>
<tr>
<td>1.3 Berries having seeds in seedless types</td>
<td>21</td>
</tr>
<tr>
<td>1.4 Berries with cap stem attached (applies only to raisins presented without capstems)</td>
<td>63</td>
</tr>
<tr>
<td>2.4 Pieces of stem (in 1kg)</td>
<td>32</td>
</tr>
</tbody>
</table>

Organisation internationale de la vigne et du vin
The OIV has adopted in 2013 recommendations for the production of dried grapes including some parameters on Moisture content.

**USA**
adding these will eliminate Table 2.

**CCTA**

USA

**USA**
<table>
<thead>
<tr>
<th>1.1 undeveloped berries</th>
<th>Organisation internationale de la vigne et du vin</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2 Damage by pests, sunburn, mechanical damage</td>
<td>USA</td>
</tr>
<tr>
<td>1.3 Berries having seeds in seedless types</td>
<td>USA</td>
</tr>
<tr>
<td>1.4 Berries with cap stem attached (applies only to raisins presented without capstems)</td>
<td>USA</td>
</tr>
<tr>
<td>1.4 Berries with cap stem attached</td>
<td>Organisation internationale de la vigne et du vin</td>
</tr>
<tr>
<td>1.5</td>
<td>USA</td>
</tr>
<tr>
<td>2. Tolerances for other defects</td>
<td>USA</td>
</tr>
<tr>
<td>2.1 Extraneous vegetable material excluding pieces of stems</td>
<td>USA</td>
</tr>
<tr>
<td>2.2 Foreign matter</td>
<td>0.01</td>
</tr>
<tr>
<td>2.3 Sugared</td>
<td>15</td>
</tr>
<tr>
<td>2.4 Pieces of stem (in 1kg)</td>
<td>3</td>
</tr>
<tr>
<td>2.5</td>
<td>USA</td>
</tr>
<tr>
<td>4.1.6 Where a characteristic coating or similar treatment has been used, appropriate terms shall may be included as part of the name of the product or in close proximity to the name: e.g. “Sugar Coated”, “Coated with X”.</td>
<td>USA</td>
</tr>
<tr>
<td>4.2.1 - oil solution to facilitate free flowing and moisture retention in raisins”</td>
<td>CCTA</td>
</tr>
<tr>
<td>ANNEX ON DRIED LONGANS</td>
<td></td>
</tr>
<tr>
<td>1.2 Style</td>
<td></td>
</tr>
<tr>
<td>(1) Dried whole longan: Whole fruit, unpeeled and unpitted.</td>
<td>USA</td>
</tr>
<tr>
<td>(3) Freeze-dried longan flesh: Peeled and pitted whole fruit of irregular shape, size and thickness and is processed by freeze drying.</td>
<td>USA</td>
</tr>
<tr>
<td>[2.1.2 Optional Ingredients</td>
<td>Malaysia</td>
</tr>
<tr>
<td>Malaysia is of the view optional ingredient in this individual annexes could be deleted as all the optional ingredients has been listed in Section 3.1.2 of Proposed Draft of General Standard For Dried Fruit.</td>
<td></td>
</tr>
</tbody>
</table>
## Optional Ingredients

### Edible stuffing material such as fruit paste

Add.1

---

### Classification

In accordance with the defects allowed in section 2.2.5 "Defects and Allowances", dried longans (excluding freeze dried longan flesh) can be classified into the following classes:

#### (2) Dried longan flesh (excluding freeze dried longan flesh)

Add.1

---

### Definition of Defects

#### Extraneous Vegetable Material (EVM)

Add.1

---

### Freeze dried longan flesh

Add.1

---

### Colour, Flavour, Odour and Texture

Add.1

---
Dried persimmon shall have normal colour, flavour and odour characteristic of dried persimmons, corresponding to the variety of persimmons. [When stuffed, a slight taste and/or odour of the stuffing may be present. The type of treatment used and shall possess texture characteristic of the product.]

[2.2.2] **Moisture content**

| USA | This table should be deleted as it is confusing. There should be a single maximum level for low moisture dried fruit, regardless of style. A moisture range for high moisture dried fruit could give a provision that it could be preserved by other means, eg pasteurization. |

| (1) Dried whole persimmon including flesh and seeds (unpitted) | USA |

| 2.2.4 | **Sizing** |

| USA | |

| Dried persimmons may be sized in accordance with Table 1. |

**Table 1:** Dried whole persimmon

| Thailand | Size codes in Table 1 need to be adjusted to avoid overlaps. |

| Semi-dried whole persimmon (peeled and unpitted) may be sized in accordance with Table 2 |

**Table 2:** Semi-dried whole persimmon

| Thailand | Size codes in Table 2 need to be adjusted to avoid overlaps. |

**Table 2:** High Moisture/Semi-dried whole persimmon

| USA | This section needs to be revised because the table as presented allows a total of 41.0% of defects. The U.S. believes that the format of the Table of Tolerances recommended for dried apricots and raisins. The working group should also consider standardizing the format of indicating defects and allowances as a table. |

| 2.2.7 | **Defects and Allowances** |

3. **LABELLING**

3.1.1 | The Name of the product shall be “Dried persimmon”, “Dehydrated persimmon”, Semi-dried “Semi-dried whole persimmon” as appropriate. | CCTA |