

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES
20th Session
Kampala, Uganda, 2 – 6 October, 2017
COMMENTS ON DRAFT STANDARD FOR KIWIFRUIT**

(Comments submitted by Albania, Costa Rica, Cuba, Ecuador, India, Ghana, Jamaica, Kenya, Peru, USA)

BACKGROUND

This document compiles the comments on the draft standard for kiwifruit at Step 6 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.

General Comments	Members or observers
Ok	Albania
Costa Rica agradece a la oportunidad de emitir comentarios. En ese sentido; desea mencionar que ha revisado el Proyecto de norma y no tiene comentarios. Por lo anterior, apoya el avance de la norma.	Costa Rica
Cuba agradece la oportunidad de dar sus comentarios al documento a pesar de que en el país no se produce este producto y propone que debe valorarse la tolerancia a la podredumbre que se describe en la clase extra	Cuba
Ecuador agradece a Nueva Zelanda por la oportunidad de comentar el documento. Por lo cual, desea informar, que ha realizado la correspondiente revisión y ha decidido abstenerse de realizar comentarios y observaciones al mismo, ya que el kiwi no es un cultivo producido en este país.	Ecuador
<p>4. Provision Concerning Sizing To prevent overlap of kiwifruits sized by weight in package, Ghana proposes the following range for weights: To ensure uniformity in size, the range in size between produce in the same package that is sized by weight shall not exceed: 10 g for fruit up to 84 g; 15 g for fruit weighing between 85 g and 119 g; 20 g for fruit weighing between 120 g and 149 g; 40 g for fruit weighing 150 g or more</p> <p>5.2 Size Tolerance We propose the removal of this section as it conflicts with provisions made in section 4 on sizing. Strict sizes have been provided in the section giving no room for allowance of tolerance.</p>	Ghana
We support the further development of this standard	Jamaica
Kenya proposes the replacement of the word "must" with shall used throughout the standard.	Kenya

Specific comments	Members or observers/Rational
TITLE	
DRAFT STANDARD FOR KIWIFRUIT	
PROYECTO DE NORMA DEL CODEX PARA EL KIWI	Peru Seguir la estructura del modelo para las normas del Codex para las frutas y hortalizas frescas
1. SCOPE	
The holder/seller of products produce may not display such products produce or offer them for sale, or deliver or market them in any manner other than in conformity with this standard. The holder/seller shall be responsible for observing such conformity.	India To be in consistent to Codex text.
SCOPE The purpose of the Standard is to define the quality requirements for kiwifruit at the export-control stage after preparation and packaging. However, if applied at stages following packaging, products may show in relation to the requirements of the Standard: a slight lack of freshness and turgidity; for fruit graded in classes other than the “Extra” Class, a slight deterioration due to their development and their tendency to perish	Kenya
The purpose of the Standard is to define the quality requirements for kiwifruit at the export-control stage after preparation and packaging. However, if applied at stages following packaging, products may show in relation to the requirements of the Standard:	USA General Comments: The United States submits the following comments in response to CL 2017/14-FFV of June 2017, Request for comments on the draft Standard for Kiwifruit (at Step 6). The United States notes that Codex standards (i) should reflect existing global trading practices and consumer concerns, and (ii) should not impose unwarranted restrictions and/or requirements for adherence and compliance. The United States comments are limited to the following three sections of the draft standard that conflict with U.S. Kiwifruit trade practices. For more than 30 years the U.S. has successfully applied its standard on both domestically produced and imported kiwifruit without any trade problems.
2. DEFINITION OF PRODUCE	
DEFINITION OF PRODUCE scope This Standard applies to kiwifruit (also known as actinidia) of varieties (cultivars) derived from <i>Actinidia chinensis</i> Planch and <i>A. deliciosa</i> (A. Chev.) C.F. Liang & A.R. Ferguson and hybrids derived from at least one of them, from the <i>Actinidiaceae</i> family, to be supplied fresh to the consumer. Kiwifruit for industrial processing are excluded. Definition of Produce	Kenya
3. PROVISIONS CONCERNING QUALITY	
3.1 MINIMUM REQUIREMENTS	
sound; produce affected by rotting or deterioration such as to make it unfit for consumption is excluded;	Jamaica Replace highlighted text with “Sound; free of rot and deterioration.”
estar bien formados; se excluyen los frutos dobles/múltiples;	Peru se sugiere su eliminación
3.1.1 Minimum Maturity Requirements	
The fruit at harvest and/or packing must have attained a degree of maturity of at least 6.2°-5°-7° Brix or an average dry matter content of 15% ¹ .	India Consumers prefer sweeter fruit which can be ensured by allowing the fruit to get higher degree of maturity at harvest. This will also help in storage and long distance

	<p>transportation. Late harvested kiwifruit will retain their flesh firmness during storage better than early harvested fruit. During transportation of fruit to market, firmness can reduce vibration injury. Late harvested kiwifruit will usually have high soluble solids concentration at harvest stage and more suitable for consumption as preferred by the consumers.</p>
<p>The fruit at harvest and/or packing must have attained a degree of maturity of at least 6.2° Brix or an average dry matter content of 15%¹.</p>	<p>Jamaica Was scientific evaluation done on all varieties of the fruit to determine a minimum Brix level 6.2° and dry matter content level of 15% for maturity? Validating brix and dry matter content for Kiwi will require laboratory analyst (deemed a additional requirement) by a registered/accredited laboratory. In context of enforcement at import border, validating the requirement may result in shipments being detained at port in await of result (this is in the event there is the absence of certificate of analyst from a reputable laboratory). the concerns my be justified by the simplification to the following text: The {name of produce} must be sufficiently developed and display features of maturity such as is common to the varietal characteristics</p>
<p>Requisitos mínimos de madurez</p>	<p>Peru Se sugiere incluir La fruta en la cosecha y / o envasado deberá haber alcanzado un grado de madurez fisiológica. Sustento: En el comercio internacional los requisitos de madurez de alimentos están referidos a la madurez fisiológica para su venta.</p>
<p>The fruit at harvest and/or packing must have attained a degree of maturity of at least 6.2°-5° Brix or an average dry matter content of 15%¹.</p>	<p>USA Section 3.1.1 MINIMUM MATURITY REQUIREMENTS (least 6.2° Brix) The fruit at harvest and/or packing must have attained a degree of maturity of at least 6.2° Brix or an average dry matter content of 15%. Issue and Rationale: The minimum Brix o requirement indicated in the draft standard is lower than that currently applied in trade. Based on U.S. inspection data, domestically produced kiwifruit at destination and imported kiwifruits upon arrival /destination have a minimum of 6.5° Brix or an average dry matter content of 15%. Additionally, Section 1 (Scope) of the draft standard states that “The purpose of the Standard is to define the quality requirements for Kiwifruit at the export-control stage after preparation and packaging”; whereas the Minimum Maturity requirement in the draft standard indicates “The fruit at harvest and/or packing”. Thus, this draft standard cites two different stages of compliance, at harvest and post packaging. It should be post packaging only. Proposal: The United States proposes the following minimum Maturity Requirement. The fruit must have attained a degree of maturity of at least 6.5° Brix or an average dry matter content of 15%.</p>
<p>3.2 CLASSIFICATION</p>	
<p>3.2.1 “Extra” Class</p>	
<p>Kiwifruit in this class must be of superior quality. They must be characteristic of the variety (cultivar). The flesh must be perfectly sound and not soft, shrivelled or water soaked. Fruit must be round or oval in cross section (not flattened), and the ratio of the</p>	<p>Jamaica What is the unit of measurement to be used? "0.8 or greater"</p>

minimum equatorial diameter to the maximum equatorial diameter of the fruit must be 0.8 or greater.	
3.2.2 Class I	
defectos leves de la piel siempre y cuando el área afectada no supere 4 cm 2.5% ² ;	Peru Se sugiere eliminar el área afectada en centímetros y colocar en porcentaje
3.2.3 Class II	
defectos de la piel siempre y cuando el área afectada no supere 2 cm 10% ² ;	Peru Se sugiere eliminar el área afectada en centímetros y colocar en porcentaje
4. PROVISIONS CONCERNING SIZING	
For <i>A. chinensis</i> and <i>A. deliciosa</i> and hybrids between these species, the minimum weight for “Extra” Class is 90g ≥90g, for Class I is 70g ≥70g and for Class II is 65g ≤60g.	India Kiwifruit is grown in appropriate climatic conditions. The proposed weight for each class; such as extra class, class I and class II will accommodate all available fruit for consumption.
40-25 g for fruit weighing 150 g or more.	India To ensure uniformity in size in the same package of the fruit weighing 150 g or more they should have less accidentance range.
(B) For fruit sized by count: <u>For Kiwifruit sized by count, size may not vary in diameter more than:</u> <u>1/2 inch (12.7mm) in sizes 30 or larger;</u> <u>3/8 inch (9.5mm) in sizes 31 through 38; and</u> <u>1/4 inch (6.4mm) in sizes 39 or smaller.</u> <u>Not more than 5 percent, by count, of the fruit in any container may exceed the diameter range specified.</u>	USA Section 4. PROVISIONS CONCERNING SIZING (Part B) (B) For fruit sized by count: The uniformity of sizing should be consistent with point (A). Issue and Rationale: The opening sentence of this section states that “Kiwifruit may be sized by weight or count, or in accordance with existing trading practices.” In the United States, the existing trading practice (since 1986) is the sizing of kiwifruit by diameter packed to a count per container; as such the uniformity is measured by diameter as well. Therefore, the uniformity requirement in section B is inconsistent with sizing in accordance with existing trade practices. Proposal: The United States proposes the following uniformity requirements for kiwifruit sized by count in accordance with its domestic industry and trade practices. For Kiwifruit sized by count, size may not vary in diameter more than: - 1/2 inch (12.7mm) in sizes 30 or larger; - 3/8 inch (9.5mm) in sizes 31 through 38; and - 1/4 inch (6.4mm) in sizes 39 or smaller. Not more than 5 percent, by count, of the fruit in any container may exceed the diameter range specified.
5. PROVISIONS CONCERNING TOLERANCES	
5.1 QUALITY TOLERANCES	
Quality Tolerances	Jamaica In keeping with the provision in the proposed Layout for Codex Standards agreed upon at the 19th session of CCFV in Mexico to facilitate a decay tolerance for Extra Class 1%, Class one at 1% and Class two at 2%. This present provision in the Kiwi Standard would be outside the provision of the proposed Layout... and therefore we are compelled to ask that the proposed layout... be use as a guide for the kiwi decay tolerance requirements.

5.1.1 “Extra” Class	
Five percent, by number or weight, of kiwifruit not satisfying the requirements of the class but meeting those of Class I. [Included therein is 4%-1% tolerance for decay, soft rot and/or internal breakdown.]	India Quality tolerance of decay in Extra Class shall have to be aligned to all standards under discussion/adoption stage based on outcome of Standard Layout for fresh fruits and vegetables lead by USA, hence not appropriate at this stage to suggest %age of tolerance.
Five percent, by number or weight, of kiwifruit not satisfying the requirements of the class but meeting those of Class I.] RATIONALE: No rotting shall be allowed in extra class. Included therein is 1% tolerance for decay, soft rot and/or internal breakdown.]	Kenya
Five percent, by number or weight, of kiwifruit not satisfying the requirements of the class but meeting those of Class I. [Included therein is 1% tolerance for decay, soft rot and/or internal breakdown.]	USA Section 5.1 QUALITY TOLERANCES Issue and Rationale: Tolerances for decay, soft rot and/or internal breakdown in all three classes. The United States draws attention to the following key factors to be taken into consideration in setting tolerances for decay, soft rot and/or internal breakdown in all three classes: <ul style="list-style-type: none"> • All fresh fruits and vegetables, including kiwifruits, are perishable by nature irrespective of the class or category they are in. • No producer, packer, exporter or trader can guarantee that every individual kiwifruit packed is perfectly sound and will arrive at destination in perfect condition. • Kiwifruits are stored at 0 to 0.6°C for up to 8 months and as such injury due to non-ambient temperatures occurs which leads to decay, soft rot and/or internal breakdown. • Sometimes non-ambient temperatures occur in transportation and distribution that are beyond the control of the shipper/exporter or trader. • The United States is a large producer and importer of Kiwifruits with vast geographical distances between domestic producers and some domestic markets - up to one week by road. • United States kiwifruit imports undertake sea voyages that range between two to six weeks, depending on their origin. • It is common global industry practice that after fruits undergo preparation and packaging, they are not always resorted before shipping. • Due to the flesh color and texture of kiwifruits that obscure internal defects, the United States national standard allows for no more than one percent at shipping point and two percent at destination and or market for kiwifruit affected by internal breakdown or decay in all three quality classes. Position: The United States supports the inclusion of a 1% tolerance for decay, soft rot and/or internal breakdown in Extra Class and a tolerance of 2% in Classes I and II.
5.1.2 Class I	
Ten percent, by number or weight, of kiwifruit not satisfying the requirements of the class but meeting those of Class II. Included therein is [2% tolerance for decay, soft rot and/or internal breakdown. Rationale: Decay would not be allowed in class 1] tolerance for decay, soft rot and/or internal breakdown.	Kenya

5.1.3 Class II	
Ten percent by number or weight of kiwifruit satisfying neither the requirements of the class nor the minimum requirements, with the exception of produce affected by decay should not be more than 2% <u>0.5 %</u> . <u>Rationale: no decay shall be allowed in class II</u>	Kenya
6. PROVISIONS CONCERNING PRESENTATION	
6.2 PACKAGING	
Kiwifruit must be packed in such a way as to protect the produce properly. The materials used inside the package must be of food grade quality, clean, and of a quality such as to avoid causing any external or internal damage to the produce. The use of materials, particularly of paper or stamps bearing trade specifications is allowed, provided the printing or labelling has been done with non-toxic ink or glue.	Jamaica Section 6.2 on Packaging, second sentence of the paragraph: there is a proposal to edit the text to read "the package must be of food grade quality, clean and of a quality such as to avoid cross - contamination to produce".
7.2.2 Nature of Produce	
El nombre de la variedad puede ser sustituido por un sinónimo. El nombre comercial⁴ sólo puede ser dado si viene acompañado por el nombre de la variedad o el sinónimo.	Peru No corresponde utilizar sinónimos, en lugar de la variedad, se presta para confusión en el comercio de alimentos y también para el consumidor
7. PROVISIONS CONCERNING MARKING OR LABELLING	
7.2.5 Official Inspection Mark (Optional)	
Marca de inspección oficial (facultativa)	Peru Se sugiere eliminar esta sección, debido a que está relacionada a los requisitos sanitarios y fitosanitarios del país importador; siendo dinámicos en el comercio internacional de alimentos.