



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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Agenda Items 3b, 3c and 3d

CX/FFV 12/17/5-Rev.

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

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**ITEM 3b: MATURITY REQUIREMENTS: METHODS OF ANALYSIS FOR THE DETERMINATION OF DRY MATTER CONTENT
(SECTION 9) (DRAFT STANDARD FOR AVOCADO) REP11/FFV, APPENDIX II**

Comments in reply to CL 2011/12-FFV from Argentina, Colombia and Iran

PART I

ARGENTINA

As regards para. 41 of REP11/FFV on the analytical method for the determination of dry matter content (method for the determination of maturity), Argentina has taken up the initial steps to validate the method as it is considered of great importance the objective measurement of the maturity of avocados.

COLOMBIA

III. Section 9. METHODS OF ANALYSIS AND SAMPLING				
Provision	Method	Principle	Type	
Dry Matter Content	[To be determined] Using a microwave oven			

The electronic working group did not send a proposal regarding the sampling method to be used to determine the dry matter content, but we consider suitable the determination of using a microwave oven due to it is the most widely used internationally because it is very fast.

IRAN

Iran submits the following information on method of analysis for the determination of dry matter content (Standard for Avocados) (Para 41 and Appendix II) to the Secretariat of the Codex Alimentarius Commission.

(DETERMINATION OF DRY MATTER CONTENT BY LABORATORY REFERENCE METHOD OR MICROWAVE-OVEN QUICK METHOD)

Introduction:

The accepted method for determination of percent dry matter is drying the sample in a (vacuum) oven at 70°C until consecutive weightings made at 2 h intervals vary by less than 3 mg (AOAC Methods 1980). Although several samples can be dried at any one time, this method has the disadvantage of usually requiring samples to be dried overnight to complete the test.

Microwave drying technology has its merits due to its speed, simplicity, low cost, and repeatability, but it results in localized drying and gives a high variability in drying times dependant on power settings and sample type.

The laboratory reference method shall be used in case of rejection and dispute.

DETERMINATION OF DRY MATTER CONTENT BY LABORATORY REFERENCE METHOD

This method allows to determine the loss of mass during the process of desiccation of the fruit.

Materials and instruments

- Analytical scale with gradation of 0.01g (error factor of around 0.1 - 0.3% dry matter)
- (Vacuum) Oven with air flow of 60°C - 105°C
- Dedicator
- Spatula or spoon
- Petri dishes (8 cm in diameter)
- Knife
- Slicer, vegetable peeler or grater
- Food processor with chopping blade or cheese grater
- Calculator, data sheet

SAMPLING

To evaluate the lot selected for inspection, take a sample of at least 15 fruits from the reduced sample.

However, fruits should be firm and free from defects such as sun scorch and pest or disease damage, which may have affected the normal ripening process.

PROCEDURE

Each time that samples are weighed, they must be controlled until the nearest centigram.

Weight and number each Petri dish (one for each chosen fruit) and take note of the weight (**A**).

Preparation of the fruit:

Take a sample of 10 gram of flesh using the slicer / peeler / grater. The sample will be taken by removing thin slices of flesh (thickness 1.5 – 2mm) from all around the cut.

In case of avocados or kiwifruit the fruit has to be prepared in following way:

- Avocados: Cut the fruit along the longitudinal diameter, eliminate the seed and the seminal tegument and remove the outer skin without peeling the flesh. The thickness of the slice should be 2mm. A total of 20 gram of fresh weight should be sampled per fruit. The peeling should be taken from the face of one quarter.

Place the slices on the Petri dish and cut the slices into smaller pieces in order to facilitate the drying process. Write down the total weight of the fresh sample + Petri dish (**B**). The weighing should be done immediately after placing the sample on the dish in order to avoid loss of water from it.

The oven should be warmed to the required temperature before the samples are put inside. (An accurate thermometer placed in a cup filled with vegetable oil should be placed inside the oven to achieve the most accurate temperature readings).

To reduce the effect of the maillard reaction, the oven should be operated by relatively low temperature.

Dry the sample in the oven with an air flow of 70° C for until constant weigh is reached (around 4 – 6 hours).

In case of avocados drying should be done in following way:

- Avocados: 60°C until constant weigh is reached (around 18 hours),

After the drying, weigh the sample and note the total weight of the dry sample + Petri dish (**C**). Weighing should take place within 15 minutes from taking the samples out of the oven.

CALCULATION

The percentage of dry matter is calculated by:

$$\text{Percentage dry matter} = \frac{(C-A)}{(B-A)} \times 100$$

A = weight of Petri dish

B = total weight of fresh sample + Petri dish

C = total weight of dry sample + Petri dish

RESULTS

It is important to record the results, to one decimal place, as well as all the details concerning method, variety and stage of maturity and ripeness of the produce being tested.

If the average readings of all fruit are equal to or greater than the limit specified in the standard, the lot has reached the minimum maturity level.

If the average readings of at least 30% of the fruits are at least 10 per cent below the limit specified in the standard, a second sample needs to be taken and analyzed with other fruits of the 20 reduced sample or from a new sample.

If the average of the two samples is below the limit specified in the standard, the lot fails the minimum maturity level and needs to be rejected. No tolerance is applied.

DETERMINATION OF DRY MATTER CONTENT QUICK METHOD USING THE MICROWAVE-OVEN

This method allows to determine the loss of mass during the process of desiccation of the fruit.

Materials and instruments

- Analytical scale with gradation of 0.01 g
- Microwave-oven, capable of reaching a power of 800 W
- Spatula or spoon
- Petri dish (8 cm in diameter)
- Knife, vegetable peeler
- Slicer, food processor with chopping blade or cheese grater
- Calculator, data sheet

SAMPLING

To evaluate the lot selected for inspection, take a sample of at least 10 fruits of each size at random from the reduced sample. However, fruits should be firm and free from defects such as sun scorch and pest or disease damage, which may have affected the normal ripening process.

PROCEDURE

Weigh an empty dish and record its weight as the tare weight (**A**).

Cut the fruit longitudinally in two parts, eliminating the seed and the seminal tegument.

From one part of the fruit, 1.5 mm-thick slices must be cut with the help of the slicer (around 5 -10 gram).

Deposit the slices without overlap on a numbered Petri dish. For each fruit a separate Petri dish is needed.

Weigh each glass-slide which contains the sample and record the weight (**B**).

Put the glass-slides into the microwave oven. It must be checked beforehand, for this thickness of the sample slice, that the desiccation is constant and that no brown coloration due to burning will appear. Establish a power of 800 W and after 4 minutes, weigh the sample directly, without allowing it to cool in the desiccators. Return the sample into the microwave for 1 minute and weigh it again. Repeat the process until the weight is constant or the difference of the mass between two consecutive weightings is not greater than 0.5 mg. The total time of desiccation ranges between 4 and 7 minutes. The final weight will be (**C**).

CALCULATION

Calculate the dry matter content as following:

$$\text{Percentage dry matter} = \frac{(C-A)}{(B-A)} \times 100$$

A = weight of Petri dish

B = total weight of fresh sample + Petri dish

C = total weight of dry sample + Petri dish

RESULTS

It is important to record the results, to one decimal place, as well as all the details concerning method, power settings, variety and stage of maturity and ripeness of the produce being tested.

If the readings of all fruit are equal to or greater than the limit specified in the standard, the lot has reached the minimum maturity level.

If the readings are below the limit specified in the standard, a second sample needs to be taken with other fruits of the reduced sample or from a new sample and analysed by the laboratory reference method before the lot will be reject.

Part I

Sources of Information

1-Bergh, B. O., J. Kumamoto, P. Chen. 1989. Determining maturity in whole avocados. Calif. Avocado Soc. Yearbook. 73:173-176.

2-Lee, Seung-Koo. 1982. A review and background of the avocado maturity standard. Calif. Avocado Soc. Yearbook. (1981) 65:101-109.

3-Rosenthal, I., U. Merin, G. Popel, and S. Bernstein. 1985. An analytical assay for the determination of oil content in avocado. Calif. Avocado Soc. Yearbook. 69:133-136.

4-Amended dry weight Procedures, Department of Food and Agriculture. California Code of Regulations Title 3. California Code of Regulations Article 11. Avocados.

NOTE: Authority cited: Sections 407, 42681, 42684, and 44988, Food and Agricultural Code. Reference: Sections 42941 and 44971, Food and Agricultural Code.

ITEM 3c: PROVISIONS CONCERNING QUALITY TOLERANCES – ALLOWANCES OF TOLERANCES FOR DECAY AND/OR INTERNAL BREAKDOWN (SECTION 4.1) (DRAFT STANDARD FOR AVOCADO). REP11/FFV, APPENDIX II

Comments in reply to CL 2012/16-FFV from Australia, Colombia, Costa Rica, Ghana, Iran and United States

PART II

AUSTRALIA

Australia wishes to provide the following comments with regard to Circular Letter 2012/16-FFV.

General Comments

Australia considers that the proposed draft revision of the standard for avocado, and all other fruit and vegetable standards, should be developed recognising:

- the requirement of the Codex Strategic Framework that “although quality provisions are fundamentally driven by the market, the Codex Alimentarius Commission (CAC) has an important role in ensuring that provisions relating to quality are sound and based on the criteria of essentiality and do not constitute disguised barriers to trade: and
- the Codex Strategic Plan 2008–2013 which requires the CAC to “ensure that texts for food quality are generic in nature and whilst maintaining inclusiveness, reflect global variations and focus on essential characteristics so as to avoid being overly prescriptive and not more trade restrictive than necessary.”

Australia’s overarching position is that Codex commodity standards should focus on protecting consumers’ health and include only definitions and essential technical criteria that ensure fair practices in food trade. Australia believes that restrictive provisions going beyond ‘criteria of essentiality’ are likely to stifle product innovation, may not be representative and inclusive of quality variations in global trade, and hence could be detrimental to consumption of fresh fruit and vegetables with negative flow-on consequences for consumer health and wellbeing.

Specific Comments

Australia believes that there needs to be reasonable tolerance in permitted levels of decay and internal breakdown to account for inevitable quality changes during storage and transport.

Australia strongly prefers that quality provisions be applied only at a single point, this being at import control, rather than through the supply chain. Australia believes that at packing, good handling practices would dictate that a zero tolerance for visible decay or breakdown would be applied. Hence, Australia suggests that destination is the logical inspection point, as otherwise countries may require that staff at their border security conduct inspections of outgoing produce, which could be very difficult to implement in some cases.

Australia suggests that in the interests of harmonising with UNECE standards for fresh fruit and vegetables, that the following text from *STANDARD FFV-42 concerning the marketing and commercial quality control of AVOCADOS – 2009*, would be appropriate for inclusion in Section 4.1 Quality tolerances:

At all marketing stages, tolerances in respect of quality and size shall be allowed in each lot for produce not satisfying the requirements for the class indicated.

Australia supports the current text in Codex Standard, such that 5% by number or weight in Extra class, and 10% by number or weight of avocados in Class 1 and Class II would be acceptable quality tolerances for decay or internal breakdown. Australia suggests that levels lower than these are difficult to achieve and to measure.

COLOMBIA

Colombia is pleased to present the following comments on **Allowances of Tolerances for Decay and/or Internal Breakdown**, considering the request of the Secretariat of Codex Alimentarius Committee.

We consider document CL 2012/16-FFV in Spanish version.

Colombia considers that allowances of tolerances for decay and/or internal breakdown of fruit should be accepted, as these defects may be associated with pests, diseases or other conditions contaminating the fruits into the package. Other terms such as degradation are not considered appropriate because they involve determinations to be made in the laboratory, which can take a long time and this is not suitable.

COSTA RICA

Costa Rica welcomes the opportunity to give their comments to CL 2012/16 FFV on Provisions concerning quality tolerances: Allowances of tolerances for decay and/or internal breakdown.

In relation to the interpretation of terms “rotting”, “decay” and “internal breakdown”, Costar Rica considers the following:

Rooting: Tissue destruction caused by microorganisms, usually bacteria; it appears as a soft tissue, which may or may not have an unpleasant smell and release of liquids.

Internal Breakdown: Fruit lesions manifested as softening of flesh with presence or absence of pathogens and bad smells.

Costa Rica does not agree to include in the standard any level of tolerance for the decay in avocado due to contamination of food can cause movement of pathogens from one country to another; also it is not recommended for the consumer health.

Also, allowing tolerances for decay means to accept a level of damage that reduces the price of produce, which may cause a disadvantage for the domestic production.

GHANA

Ghana appreciates the opportunity to submit comments on the agenda item No. 3(c) REP 11/FFV, Appendix II: Provisions concerning quality tolerances – Allowances of tolerances for decay and/or internal breakdown.

SPECIFIC COMMENTS

Comment: Section 4 Provision Concerning Tolerances

The minimum requirements of the draft Codex Standards for Avocado (Section 2.1.1) indicates that “the produce must arrive at the place of destination in satisfactory condition”. However, given the nature of avocados, tolerance may be made for internal breakdown and decay. Tolerance may be made for decay around the stalk. This should not be more than 10mm wide and not more than 10mm into the flesh of the fruit.

Ghana, however, has no statistical data to back tolerances for decay and internal breakdown.

Additionally, there is the need to consider the quality requirements regarding the concentration of sclerenchyma stone cells in/on the fruit.

IRAN

- Iran is pleased to submit the following comments in response to CL 2012/16-FFV (JUNE 2012): on allowance of tolerance form decay and/or internal breakdown (draft codex standard for Avocados) (REP 11/FFV, Appendix II) to make clear interpretation of the terms rotting, decay and internal breakdown.

Decay: The meaning of decay is rotted matter or the state of rotting, deteriorating or declining. The destruction or decomposition of organic matter as a result of bacterial or fungal action.

If the committee considers that a definition is desirable, then Iran suggests retaining only the first sentence of the definition proposed to read:

Decay is rotted matter or the state of rotting, deteriorating or declining.

Rotting: The term rotting is any of various plant diseases caused by fungi or bacteria and characterized by decay. Any of several plant diseases characterized by the breakdown of tissue and caused by various bacteria or fungi.

If the committee considers that a definition is desirable, then Iran suggests retaining only the first sentence of the definition proposed to read:

Any of various plant diseases caused by fungi or bacteria and characterized by decay.

Breakdown The meaning of definition for breakdown is decay or deterioration of organic material through the enzymatic activity of microorganisms to become damaged, weakened, or useless because of decay.

Internal breakdown within avocado fruit is mainly due to enzymatic activity of the fruit, but decay is caused by pest, microorganisms, and fungi which can't be seen with unaided eye. Part relating to pests in section 2.1 in this standard is deleted and only section relating to fungi and microorganisms are retained. Considering the fact that avocado is a fruit with 32% of moisture content water and maximum of 23% dry matter; then probability of microbial or fungal decay is unlikely. Therefore, any decay in this fruit can occur during storage and shipment stages and as such decay of 1-2% must be permissible, which will help and facilitate trade of this fruit.

- Iran supports the proposed UNECE standard FFV-42 concerning the marketing and commercial quality control of Avocados in section IV Provision concerning tolerance (A Quality tolerance) on the rationale for the inclusion of tolerances for decay and/or internal breakdown in the quality classes and the percentages proposed (Section 4.1).

UNITED STATES OF AMERICA

The United States is pleased to submit the following comments in response to CL 2012/16 –FFV Request for Comments and Information on *Provisions Concerning Quality Tolerances: Allowance of Tolerances for Decay and / or Internal Breakdown* (Draft Codex Standard for Avocado) (REP11/FFV, APPENDIX II)

Specific Comments:

Issue: The need for Allowances of Tolerances for Decay and/or Internal breakdown in avocados.

Proposal: The U.S. proposes setting a tolerance for Decay and Internal Breakdown in the Draft Proposed Revised Codex Standard for Avocados and adding text to the description of Extra, Class I and class I as follows (new text in bold):

Section 4 – Provisions concerning Tolerances

4.1.1 “Extra” Class

Five percent by number or weight of avocados not satisfying the requirements of the class, but meeting those of Class I or, exceptionally, coming within the tolerances of that class, **but not more than 1.0% of avocados affected by decay or internal breakdown.**

4.1.2 Class I

Ten percent by number or weight of avocados not satisfying the requirements of the class, but meeting those of Class II or, exceptionally, coming within the tolerances of that class, **but not more than 1% of avocados affected by decay or internal breakdown.**

4.1.3 Class II

Ten percent by number or weight of avocados satisfying neither the requirements of the class nor the minimum requirements, with the exception of produce affected by rotting, marked bruising or any other deterioration rendering it unfit for consumption, **but not more than 2% of avocados affected by decay or internal breakdown.**

Rationale:

Avocados, as any other fresh fruits and vegetables, are perishable by nature. However, they are more susceptible to decay and internal breakdown due to:

- Internal damage due to vibration and physical impact during transportation. During this process, the seed/stone loosens from the mesocarp and compacts the mesocarp from inside giving rise to internal decay and breakdown. In large seeded avocado varieties, compaction of the mesocarp is more common.
- In rainy tropical countries where integrated post-harvest practices are not comprehensively developed, avocado is a highly perishable fruit. Under these conditions there is increased occurrence of Diplodia, Rhizopus rot, anthracnose and other fungi affecting the avocado.
- Avocados do not ripen on the tree, but once they are harvested, the ripening process begins. So with higher level of physiological maturity, the ripening time-span shortens while the senescence rate increases which escalates the probability of decay and internal breakdown occurring. Previously, it was thought this only affected physiologically mature Antillean/West Indian/Guatemalan avocado varieties for they are usually harvested at a high level of physiological maturity. However, current consumer demand for more physiologically developed avocados has led to an increase in incidences of decay and internal breakdown among all avocado varieties commercially traded.
- Unripe avocados are very sensitive to ethylene gas exposure. When they are stored near ripe fruits that produce ethylene, placed in close proximity with fruits treated with ethylene gas, or exposed to ethylene during handling and/or storage, the avocado ripening/softening process accelerates.
- Avocado heat production is greater than many other fruit crops, hence a slight increase in storage temperature is magnified and can quickly result in a faster rate of ripening and, if left unchecked during long sea voyages or storage period, this process rapidly escalates rendering a lot as a complete loss. A slight decrease in ambient temperature during storage or transportation also leads to internal chilling injury that manifests as decay and/or internal breakdown when the fruit ripens.
- Not all avocado varieties have the same ambient storage temperature. For example Antillean/West Indian/Guatemalan race of avocados ('Fuchs', 'Pollock' and 'Waldin') are cold sensitive and quickly develop chilling injury when stored at 13°C; whereas "Booth 7", "Booth 8" and "Lula", are cold tolerant and can be stored at 4°C.

**ITEM 3d: DRAFT PROVISIONS FOR UNIFORMITY RULES AND OTHER SIZE-RELATED PROVISIONS AT STEP 7
(SECTIONS 5.1 AND 6.2.4) (DRAFT STANDARD FOR AVOCADO) – CX/FFV 12/17/6**

Comments at Step 6 from Argentina, Colombia, Costa Rica, Cuba, Ghana, Iran and Paraguay

PART III

ARGENTINA

5.1 UNIFORMITY

We agreed with the proposal of the EWG:

“To ensure uniformity in size between produce in the same package when they are sized by count, the weight of the smallest fruit shall be not less than 75% of the weight of the largest fruit in the same package.”

The rationale is that the proposed text is based on a simple determination, easy to apply, allowing certain flexibility as regards the sizing requirements and, in terms of uniformity in the same package, as regards the sizing indicated on the package.

6.2.4 COMMERCIAL IDENTIFICATION

Argentina agrees with the proposal of the EWG to add in the second line of the text the phrase “or by count” as follows:

“Size expressed in minimum and maximum weight in grams **or by count**”

Also, Argentina express that as there is no sizing scale y size code as the option of sizing will be by count or weight we agree with the removal of the third indent as it refer to the sizing table and its respective code which is not longer mandatory for marking.

COLOMBIA

Colombia is pleased to submit the following comments to the document **Draft Provisions for Uniformity Rules and Other Size-Related Provisions (Sections 5.1 and 6.2.4) (Draft Standard for Avocado)** at Step 6, sent by the Secretariat of the Codex Alimentarius Committee.

Henceforth we consider the document CX/FFV 12/17/6 in Spanish version.

I. Section 5.1 UNIFORMITY

The contents of each package must be uniform and contain only avocados of the same origin, variety, quality and size. The visible part of the contents of the package must be representative of the entire contents.

~~[To ensure uniformity in size between produce in the same package when they are sized by count, the weight of the smallest fruit shall be not less than 75% of the weight of the largest fruit in the same package]~~

Colombia considers that the second paragraph proposed by the electronic work group is not appropriate. For example, applying the proposal of the electronic work group is observed that in class 4, the difference that should be accepted regarding the sizes between the largest fruit and the smallest fruit in a box is 250 g. This is a very high value so it is not possible the uniformity. A big difference in weight is also directly related to a big difference on the surface of the fruit. Fruits of a greater weight will have a greater surface, therefore the ethylene production rate is increased, affecting the atmosphere into the package and accelerating the ripeness of fruits in package, which affects the life expectancy of avocados contained in the package.

In addition to the previous comment, it is noted that the size tolerance is considered in 4.2, which controls that avocados contained in a package have not very different sizes. Therefore, the second paragraph proposed in 5.1 is not justified. Text in 4.2 is:

4.2 SIZE TOLERANCES

For all classes, 10% by number or weight of avocados corresponding to the size immediately above or below that indicated on the package.

II. Section 6.2.4 Commercial Identification

- Class;
- Size expressed in minimum and maximum weight in grams ~~or by count~~;
- **Code number of the size scale and count of fruits when it is different from reference number;**
- Net weight (optional).

Colombia considers that the proposal submitted by the electronic working group regarding the paragraph 6.2.4 is not appropriate. Size per weight as described in the second bullet must be guarantee on the package as well as the sizing code, which guarantees the uniformity in the content and the produce quality. Therefore, weight or number of fruits is not an option but they must be declared.

COSTA RICA

Costa Rica welcomes the opportunity to give their comments to the document CX/FFV 12/17/6 Draft Provisions for Uniformity Rules and Other Size-Related Provision (DRAFT STANDARD FOR AVOCADO).

(i) Specific remarks:

In connection with paragraphs 5.1 and 6.2.4 it considers the following:

5.1 UNIFORMITY

The contents of each package must be uniform and contain only avocados of the same origin, variety, quality and size. The visible part of the contents of the package must be representative of the entire contents.

To ensure uniformity in size between produce in the same package when they are sized by count, the weight of the smallest fruit shall be not less than 75% of the weight of the largest fruit in the same package.

6.2.4 Commercial Identification

- Class;
- Size expressed in minimum and maximum weight in grams **or by count**;
- ~~- [Code number of the size scale and count of fruits when it is different from reference number;~~
- Net weight (optional).

With regard to paragraph 5.1 Uniformity, Costa Rica is agreed with the change made extending the text in bold and highlighted.

Lastly, in paragraph 6.2.4 Commercial Identification, Costa Rica is agreed with the change that was performed.

CUBA

Specific comments

5.1 UNIFORMITY

The proposal issued by the EWG chaired by Spain has been accepted regarding the uniformity of avocados sized by count as referred: **To ensure uniformity in size between produce in the same package when they are sized by count, the weight of the smallest fruit shall be not less than 75% of the weight of the largest fruit in the same package.**

It considers market practices and it may be framed in efforts to harmonize the Codex and UNECE Standards for fresh fruits and vegetables.

6.2.4 Commercial Identification

It is accepted to include - Size, expressed as minimum and maximum weight in grams **or by count**; and eliminate the text between square.

GHANA

Ghana appreciates the opportunity to submit comments.

Comment: 5.1 Uniformity

Ghana supports the proposed text regarding uniformity rules as:

To ensure uniformity in size between produce in the same package when they are sized by count, the weight of the smallest fruit shall be not less than 75% of the largest fruit in the same package.

Rationale: The proposed text gives a scientific basis for weight sizing; which cuts across the varied weights of the produce thereby ensuring uniformity between produce in the same package.

Comment: 6.2.4 Commercial Identification

Ghana agrees with the insertion of "**or by count**" to the second indent and the deletion of bullet three.

Rationale: This provides for two sizing options, that is, by weight and by count as with other Codex standards.

IRAN

Iran is pleased to submit the following comments in response to CX/FFV 12/17/6 (JUNE 2012): on draft codex standard for Avocados with the following resulting comments based on the bold and italic text within the sections/paragraphs indicated.

Specific comments:

Section 6.2.4 COMMERCIAL IDENTIFICATION

We support to add the words "**or by count**" because we will have two sizing option in section 3. This allows for different sizing count and facilitates trade without creating any barrier.

PARAGUAY

Paraguay greets the working group that prepared the Proposed Draft Standard for Avocado and appreciates the power to submit its comments to the document.

1^o) In Section 5.1 Uniformity

The contents of each package must be uniform and contain only avocados of the same origin, variety, quality and size. The visible part of the contents of the package must be representative of the entire contents.

The new proposal by the Electronic Working Group must be deleted: ~~To ensure uniformity in size between produce in the same package when they are sized by count, the weight of the smallest fruit shall be not less than 75% of the weight of the largest fruit in the same package.~~

It is considered that the range established by EWG is very wide, so there would be a great difference in size of fruits, resulting in a failure in the characteristics of uniformity.

2^o) In 6.2.4. Commercial Identification

- Class
- Size expressed in minimum and maximum weight in grams **or by count.**
- The following should be deleted: ~~Code number of the size code and count of fruits when it is different from reference number.~~
- Net weight (Optional).