

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 4

CRD3

**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 GARLIC**

(Comments submitted by European Union, Philippines, Thailand, African Union)

European Union

Mixed Competence

Member States Vote

Paragraph and section number	Original text	Proposed text	Reason for the change / inclusion
1. Scope		The purpose of the standard is to define the quality requirements for Garlic 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: <ul style="list-style-type: none"> • a slight lack of freshness and turgidity; • for products graded in classes other than the “Extra” Class, a slight deterioration due to their development and their tendency to perish. The holder/seller of products may not display such products 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.	In line with the standard layout.
1. Definition of produce	Green garlic with undeveloped cloves and garlic for industrial processing are excluded.	Green garlic with full leaves and undeveloped cloves and garlic for industrial processing are excluded.	Clarification for "green garlic".
1. Definition of produce	The following commercial types are covered by the Standard... <ul style="list-style-type: none"> • Solo Garlic: garlic bulbs that consist of only one clove 	The following commercial types degrees of dryness are covered by the Standard <ul style="list-style-type: none"> • Solo Garlic: The garlic bulbs that may consist of several or only one clove ("solo garlic") 	The term 'commercial types' causes trouble in the section on labelling. In 6.1.1 those types are called "name of the produce". In 6.2.2 it is also 'name of the produce', but then commercial type is optional. According to section 1 this would be the same terminology.
1. Definition of produce	<ul style="list-style-type: none"> • Fresh garlic: produce with a fresh stem, soft and flexible outer skin of the bulb; • Semi-dry garlic: fresh produce with the stem and incompletely dry outer skin of the bulb; 	<ul style="list-style-type: none"> • Fresh garlic: produce with a fresh stem and with the outer skin of the bulb soft and flexible outer skin of the bulb; • Semi-dry garlic: fresh produce with the stem and outer skin of the bulb not completely dry incompletely dry outer skin of the bulb; 	Clarification.

2.1 Minimum Requirements	<ul style="list-style-type: none"> practically free of pests and damage caused by them affecting the general appearance of the produce; 	<ul style="list-style-type: none"> practically free of pests; practically free of damage caused by pests affecting the general appearance of the produce; 	Clarification in line with standard layout.
2.1 Minimum Requirements	<ul style="list-style-type: none"> free of any foreign smell and/or taste¹ ¹ This provision does not preclude a specific smell and/or specific taste caused by smoking in countries or regions where smoked garlic is considered as a fresh vegetable. Smoked garlic must be labelled properly 	<ul style="list-style-type: none"> free of any foreign smell and/or taste¹ ¹This provision does not preclude a specific smell and/or specific taste caused by smoking in countries or regions where smoked garlic is considered as a fresh vegetable. Smoked garlic must be labelled properly 	The labelling requirement should be present in the appropriate chapter (see point 6.1.1 and 6.2.2).
2.2.1 "Extra Class"	The bulbs must be of regular shape and compact	The bulbs must be of regular shape and properly cleaned. The cloves must be compact.	Clarification and requirement of cleanness for "extra class".
2.2.2 Class I	The bulbs may be less compact than in extra class	The bulbs may be less compact than in extra class. The cloves must be reasonably compact.	Clarification.
2.2.3 Class II	<ul style="list-style-type: none"> slight tears on the external skin or missing parts of the outer skin of the bulb not exceeding the half of the surface; 	<ul style="list-style-type: none"> slight tears on the external skin or missing parts of the outer skin of the bulb not exceeding the half of the surface; 	Slight tears are accepted already in Class I, tears should be accepted in Class II, considering that missing part of the outer skin is also accepted.
2.2.3 Class II	<ul style="list-style-type: none"> slight staining on the outer skin not exceeding more than half of the bulb surface; 	<ul style="list-style-type: none"> slight staining on the outer skin not exceeding more than half of the bulb surface; 	"Slight" staining is allowed within the tolerance for Class I. To be consistent, in Class II "slight" should be deleted and "staining" allowed.
2.2.3 Class II	<ul style="list-style-type: none"> no more than two damaged cloves; 	<ul style="list-style-type: none"> no more than two damaged cloves; 	This defect is not accepted as the term "damage" may comprise <ul style="list-style-type: none"> mechanical damage, which should be covered by "healed injuries" and/or physiological damages (which would be internal damages). Trade and consumers are not willing to accept internal damages.
3 Provisions concerning sizing	<p><i>First paragraph, last sentence:</i></p> <p>The following methods are guides and may be used on an optional basis.</p>	The following methods are guides and may be used on an optional basis.	For consistency with the next sentence "If a size code is used the provisions of the following table must be respected"
3 Provisions concerning sizing		<p>New provisions on minimum size:</p> <p><u>When determined by the maximum diameter of the equatorial section the minimum size shall be:</u></p> <ul style="list-style-type: none"> <u>45 mm for "Extra" Class</u> <u>30 mm for Classes I and II.</u> <p><u>For bulbs not sized by diameter, the minimum size shall be consistent with the minimum diameter indicated above.</u></p>	For consistency with other standards, provisions on minimum size should be developed.

3 Provisions concerning sizing	If a size code is used the provisions of the following table must be respected	a) If a size code is used the provisions of the following table must be respected	Size code is one of the option
		b) to ensure uniformity in size, the range in size between produce in the same package shall not exceed: <ul style="list-style-type: none"> • 15 mm when the smallest bulb has a diameter of less than 40 mm • 20 mm when the smallest bulb has a diameter equal to or more than 40 mm. 	For consistency with other standards, provisions on uniformity should be developed.
4.1.1 "Extra" Class	Five percent by number or weight of bulbs not satisfying the requirements of the class, but meeting those of Class I. Within this tolerance not more than 1% in total may consist of produce satisfying the requirements of Class II.	Five percent by number or weight of bulbs not satisfying the requirements of the class, but meeting those of Class I. Within this tolerance not more than $\pm 0.5\%$ in total may consist of produce satisfying the requirements of Class II.	Necessity to keep the exceptional nature of products classified in "Extra" Class.
4.1.2 Class I	In addition, not more than 1% by weight of bulbs may have cloves with externally visible sprouts.	In addition, not more than 1% by number or weight of bulbs may have cloves with externally visible shoots sprouts .	As for all other tolerances, the percentage may refer to weight or number
4.1.2 Class I		New paragraph: <u>In addition to this tolerance, not more than 25% by number or weight, of bulbs showing slight staining on the outer skin of the bulb, provided it does not cover more than a quarter of the bulb surface.</u>	Slight stain is a defect that normally happens as garlic grows directly in the soil, and often is dried in the orchard once harvested. A higher tolerance for visual defect should be acceptable.
4.1.3 Class II	In addition, not more than 5% by weight of bulbs may have cloves with externally visible sprouts.	In addition, not more than 5% by number or weight of bulbs may have cloves with externally visible shoots sprouts .	As for all other tolerances, the percentage may refer to weight or number
4.2 Size tolerances	For all classes, ten percent by number or weight of bulbs not corresponding to the size indicated on the package.	For all classes: ten percent by number or weight of bulbs not corresponding to the size indicated on the package or not satisfying the requirements as regards sizing.	Tolerance should also exist for minimum size and uniformity
6.1.1 Nature of produce	If the produce is not visible from the outside, each package shall be labelled as to the name of the produce ("garlic" and/or "fresh garlic", "semi-dry garlic", "dry garlic" or "solo garlic") and the name of the variety.	If the produce is not visible from the outside, each package shall be labelled as to the name of the produce ("garlic" and/or "fresh garlic", "semi-dry garlic", "dry garlic" or "solo garlic") and the name of the variety. <u>Name of the variety and/or commercial type (optional).</u>	Information of the name of the variety is not essential but consumer may be informed about the variety and/or the commercial type.
6.1.1 Nature of produce		New paragraph: <u>"Smoked", where appropriate.</u>	Consumer should be informed when garlic has been dried by smoking.
6.2	Each package must bear the following particulars, in letters grouped on the same side, legibly and indelibly marked, and visible from the outside, or in the documents accompanying the shipment.	Each package must bear the following particulars, in letters grouped on the same side, legibly and indelibly marked, and visible from the outside, or in the documents accompanying the shipment.	Package must be labelled: a replacement by the accompanying documents is not an alternative
6.2.2	Name of the variety or commercial type (optional).	Name of the variety or commercial type <u>('white garlic', 'pink garlic', etc.)</u> (optional).	For clarification between the name of the produce and the commercial type

6.2.2 Nature of produce		1 new paragraph: "Smoked", where appropriate.	Garlic dried by smoking. have particular characteristics and this should be mentioned.
6.2.4 Commercial Identification	- size expressed as minimum and maximum diameters of the bulb or size code;	- if sized , size expressed as minimum and maximum diameters of the bulb or size code;	Sizing of garlic is optional.
New section at the end of the Codex standard for Garlic		NOTE: The UNECE has published the Standard FFV-18 concerning the marketing and commercial quality control of Garlic. This Standard is available at: https://www.unece.org/fileadmin/DAM/trade/agr/standard/fresh/FFV-Std/English/18Garlic_2016_E.pdf The OECD Scheme for the Application of International Standards for Fruit and Vegetables has published an explanatory illustrated brochure on the application of this standard. The publication may be obtained from the OECD bookshop at: http://www.oecd.org/agriculture/fruit-vegetables/publications/brochures/	Relevant information for producers and traders. Necessity of transparency. This will avoid unnecessary barrier to trade.

Philippines

2.1 MINIMUM REQUIREMENT

The Philippines proposes to simplify the minimum requirements of garlic to the following:

- Whole bulb, covered with outer skin
- Firm, clean and free from any visible foreign matter
- Free from visible shoot
- Free from dead and living insects, mold and other contaminants.

2.1.1 The term **physiologically mature** must be inserted thus to read:

Garlic must be carefully harvested when **physiologically mature** or have reached an appropriate degree of development in accordance with criteria proper to the variety and/or commercial type and to the area in which they are grown.

JUSTIFICATION: Physiological maturity is reached after 90 days or 3-4 months after planting and 50% fallen tops if free from disease. (BPGR 1990, Descriptor for Garlic)

2.2 CLASSIFICATION

The Philippines proposes the size classification of garlic as follows:

2.2.1 Extra class

Garlic in this class must be of superior quality and have color characteristic of the variety. The bulbs must be mature, intact, regularly-shaped, clean, well-cured, free of defects with the exception of superficial defects provided these do not affect the general appearance of the produce, the quality, the keeping quality and presentation in the package. The cloves must be compact. The roots must be cut close to the base of the bulb.

2.2.2 Class I

Garlic in this class must be of good quality, mature and well-cured, fairly regularly-shaped, compact with cloves well-enclosed, well-filled and fairly plump. The bulbs are free from mold, decay, shattered cloves, sprouts, sunscald, cuts and from damage caused by stains, disease and insects. Slight bulb swellings may be allowed. The tops shall not be more than 5 cm in length. The roots must be cut close to the base.

2.2.3 Class II

Garlic in this class must be mature and well-cured, compact, fairly well enclosed, may be irregularly shaped, with cloves fairly plump, reasonably free from mold, decay, sprouts, cut and from damage caused by dirt or stains, roots and disease. Healed injuries and slight bruises may be allowed. The tops shall not be more than 5 cm in length.

3. PROVISIONS CONCERNING SIZING

The Philippines proposes that the size classification of garlic be simplified to three categories only which are aptly described in the previous section.

Garlic shall be classified according to size based on diameter as shown in Table 1*.

Table 1. Sizing Classification

Classification	Size	Diameter (cm)
Extra class	Large	>4
Class I	Medium	3.0 – 3.9
Class II	Small	2.0 – 2.9

*PNS/BAFPS 51:2007

Thailand

2. PROVISION CONCERNING QUALITY

2.1 Minimum requirement

We propose additional requirement for dry garlic to ensure that its roots must be trimmed close to the base of bulb by moving the last sentence of 2.2.1 to be inserted in this section as follows:

- free of long root tufts

- "For dry garlic, the roots must be trimmed close to the base of the bulb."

2.2 CLASSIFICATION

2.2.1 "Extra" Class, last sentence

Consequence to our comment on Section 2.1, the last sentence should be deleted as follows:

- "~~For dry garlic, the roots must be trimmed close to the base of the bulb.~~"

2.2.2 Class I

As garlic's root may lead to contamination from soil, we therefore propose that slight defect on the "the length of root" should be added.

3. PROVISION CONCERNING SIZING

As there are more than ten size codes for garlic, our preference is to numeric size code as it is more user-friendly.

The diameter of solo garlics can be varied from 12 mm-19 mm, we therefore, propose to revise size code M to reflect their current sizes in trade to read as follows:

Size code	Range of diameter in mm
M 13	≤19 15-19
14	12-15

4.1 QUALITY TOLERANCES

4.1.2 Class I First paragraph

The allowance on decay for garlic in Class I is not acceptable as it could effect the quality of garlic. The second sentence should be amended to read as follow:

"Ten percent by number or weight of bulbs not satisfying the requirements of the class, but meeting those of Class II. Within this tolerance not more than 1% in total may consist of produce satisfying neither the requirements of Class II nor the minimum requirements, ~~or of produce affected by decay.~~"

Second paragraph

We wish to underline that Sprout is a continual growing process and 1 % of visible sprout at export may lead to higher number of sprout at destination. Therefore, we propose to reduce the number of visible sprout from 1% to **0.5** %. The amended text would then read:

"In addition, not more than **0.5** 4% by weight of bulbs may have cloves with externally visible sprouts."

4.1.3 Class II

Second paragraph

For consistency with Class I, it would be appropriate to amend the “ % of visible sprout” from ~~5%~~ to 1%. The amended text would read:

“In addition, not more than ~~5~~1% by weight of bulbs may have cloves with externally visible sprouts.”

African Union

Issue: Format of the standard

Position: AU proposes that the format for the draft Standard be revised so that its starts with the “Scope” to harmonize with the formatting for the Proposed Layout for Codex Standards for Fresh Fruits and Vegetables.

Rationale: To harmonize with the formatting for the Proposed Layout for Codex Standards for Fresh Fruits and Vegetables.

Issue: Section 2.1, “Minimum requirements, (bullet 7)”

This provision does not preclude a specific smell and/or specific taste caused by smoking in countries or regions where smoked garlic is considered as a fresh vegetable.

Position: AU proposes that “Smoked Garlic” should not be included in the draft Standard for Garlic, because smoking garlic means processing it which will exclude the product from the scope of fresh Garlic which is considered as a non-processed vegetable.

Rationale: Smoked garlic is outside the scope of the Standards for fresh fruits and vegetables specifically for fresh garlic.

Issue: Sections 2.1.1 and 2.1.2

Position: AU proposes that Section 2.1.2 becomes part of Section 2.1 and that Section 2.1.1 be “Minimum Maturity Requirements”.

Rationale: To harmonize this Section of Garlic Standard with the Proposed Layout for Codex Standards for Fresh Fruits and Vegetables.

Issue: Section 3, Provisions Concerning Sizing (Table 1: Sizing Specifications)

Position: AU proposes to revise the provision concerning sizing to read as “≥ 75” as range of diameter in mm for “Size code A”.

Rationale: The current provision excludes garlic with diameter of 75mm from the sizing specifications. The new revision will ensure the inclusion of products with a diameter of 75mm in the sizing specifications for size code A.

Issue - Section 4.1.1: “Quality tolerances (Extra Class)” allows inclusion of two classes (I and II)

Position: AU proposes that “Extra class” should not tolerate produce satisfying requirements of “Class II”. The recommend revising the requirement to read as follows: Five percent by number or weight of bulbs not satisfying the requirements of the class, but meeting those of class I. ~~Within this tolerance, not more than 1 percent in total may consist of produce satisfying the requirements of class II”.~~

Rationale: There should not be three classes in one package.

Issue - Section 4.1.2, “Class I”:

“Ten percent by number or weight of bulbs not satisfying the requirements of the class, but meeting those of Class II. Within this tolerance not more than 1% in total may consist of produce satisfying neither the requirements of Class II nor the minimum requirements, or of produce affected by decay”.

Position: AU proposes to delete “satisfying neither the requirements of Class II nor the minimum requirements, or of produce” so that the requirement reads as follows: “Ten percent by number or weight of bulbs not satisfying the requirements of the class, but meeting those of Class II. Within this tolerance not more than 1% in total may consist of produce ~~satisfying neither the requirements of Class II nor the minimum requirements, or of produce~~ affected by decay”.

Rationale: For a produce to be classified, it should meet the minimum requirements.

Issue: The current Section 6.1.1:

“If the produce is not visible from the outside, each package shall be labeled as to the name of produce”. And the subsequent paragraph. Name of the produce “garlic” and/or “fresh garlic”, “semi-dry garlic”, “dry garlic” or “solo garlic” and the name of the variety”.

Position: We propose to delete the statement “if the contents are not visible from the outside” to read as follows; Name of the produce “garlic” ~~if the contents are not visible from the outside~~. Name the variety. And the same statement should be deleted from the subsequent paragraph to read as follows; Name of the produce “garlic” and/or “fresh garlic”, “semi-dry garlic”, “dry garlic” or “solo garlic” and the name of the variety”.

Rationale: Labeling of the package should be required whether the contents of the package are visible from the outside or not and the produce name should be mentioned on the label.