

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3, 4, 5, 6, 7, 8 and 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES Twenty-first Session

Monterrey, Nuevo León, Mexico, 7 – 11 October 2019

COMMENTS OF THAILAND

Agenda Item 3, Draft standard for kiwifruit: tolerance for decay (at Step 7) (CX/FFV 19/21/4)

Thailand would like to thank New Zealand, Mexico and Iran for great work in leading the electronic Working Group (eWG). We are pleased to provide our comments on specific sections as follows:

Section 5.1

Thailand proposes the addition of “At all marketing stages” in the beginning of the first sentence in order to be consistent with the Layout for Codex Standards for Fresh Fruits and Vegetables.

Section 5.1.1 “Extra” Class

Thailand would like to reiterate our previous position that decay and rot are serious defects that could affect the quality of kiwifruit. The “Extra” Class should only be for superior produce and its quality must be better than produce in other classes in order to justify the high price. Hence, it is not justified to make allowance for decay, soft rot and internal breakdown in “Extra” class. We, therefore would like to propose amendments as follows:

“Five percent, by number or weight, of kiwifruit not satisfying the requirements of the class but meeting those of Class I. ~~Included therein is 0.5% tolerance for decay, soft rot and/or internal breakdown.~~”

Section 5.1.2 Class I

Thailand supports the eWG proposal to include 1% tolerance for decay, soft rot and/or internal breakdown in Class I, which reflects the existing trade practices for fresh fruits and vegetables due to their perishable nature.

We propose to delete the second and third paragraph under Section 5.1.2, because in Section 5.1, we proposed addition of “At all marketing stage” which include all the details of this content.

Therefore, the amendments proposed are as follows:

“Section 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 1% tolerance for decay, soft rot and/or internal breakdown.

~~However, tolerances for decay [in “Extra” Class and Class I] shall not be acceptable at the stages of:~~

- ~~•Preparation,~~
- ~~•Packaging, and~~
- ~~•At the export control points.~~

~~The minimum requirements in relation to the standard for decay tolerances shall be applicable at points beyond the export control points.”~~

Section 5.1.3 Class II

We agree that the tolerance for decay, soft rot and/or internal breakdown should be allowed not more than 2% for Class II.

Agenda Item 4, Draft standard for garlic (at Step 7) (CX/FFV 19/21/5)

Section 2. Definition of Produce

Thailand would like to amend the first paragraph would read “This Standard applies to bulbs of commercial varieties of ~~fresh~~ garlic grown from *Allium sativum* L., of the Alliaceae family, ~~with and without the skin,~~ whereas presented with skin, a certain degree of external dryness can be observed without clove or cloves freshness detriment, to be supplied fresh to the consumer, after packaging and packaging. ~~Fresh~~ Garlic constituted of several cloves and the garlic known as garlic Solo, constituted of a single clove are included. Green garlic with full leaves, undeveloped cloves and garlic for industrial processing are excluded.”

Rationale: Produce without its skin potentially has short shelf-life, thus hinder any long transportation. Moreover, this type of produce may be categorized as a primary processed product. Comparing to the garlic with skin, this type of produce needs a stricter control of the safety and the hygienic practices during production process.

Thailand proposes to amend the second paragraph as follows:

“The following degrees of dryness of outer skin for ~~fresh~~ garlic are cover by the Standard:

- Early Fresh garlic: produce with a fresh stem...
- Semi – dry garlic skin: produce with the stem...
- Dry garlic skin: produce in which the stem...”

Rationale: For clarity of the characteristics of garlic that the dryness is reflecting only the skin, and avoid confusing to the other product as dried-flesh garlic.

Section 3.1 Minimum Requirements

Position: 11th bullet

Thailand proposes an additional the word “trimmed” in the sentence, so the sentence would read “For dry garlic the root must be **trimmed** close to the base of the bulb. If presented with cut stems, the length should not exceed 3 cm. There shall be no length requirement for stems of braided garlic.”

Rationale: For better clarification.

Section 3.2.1 “Extra” Class

Position: Thailand proposes to amend the last sentence of this section, hence it should read “The bulb must be of regular shape and ~~[properly cleaned]~~. ~~The cloves must be compact.~~”

Rationale: In the 4th bullet of Section 3.1 Minimum Requirement, it indicates that the garlic must be clean, therefore, Thailand is of the view that the word ‘properly cleaned’, can be omitted from this section.

Section 3.2.3 Class II

Position 1: 1st Bullet

Thailand would like to seek clarification on the difference between the terms “external skin” and “outer skin” as well as the consideration of “not exceeding the half of the surface” in practice.

Position 2: 7th Bullet

we would like to rewrite this section to be, “~~no more than~~ maximum three cloves, or ~~one-fifth~~ 20% of the total number of cloves in a bulb may be missing, whichever is lower,

Rationale: For better clarification of the text.

Section 3. Provision Concerning Sizing

Position 1: Thailand proposes to change the size codes to be numeric.

Rationale 1: To harmonize with the Layout for Codex Standards for Fresh Fruits and Vegetables

Position 2: Thailand propose to revise the size codes as follows:

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

Rationale 2: The diameter of solo garlics can be varied from 12 mm-19 mm, so we would like to propose additional size code to cover the current sizes of garlic in trade.

Section 5.1.1 “Extra” Class

Position: Thailand would like to delete the last sentence, “Within this tolerance not more than 1% in total may consist of produce satisfying the requirements of Class II”.

Rationale: The “Extra” class should be of superior quality.

Section 5.1.2 Class I

Position 1: Thailand would like to propose the deletion of the last sentence “~~or of produce affected by decay~~”

Rationale 1: Decay is a serious defect that could affect the safety and quality of garlic.

Position 2: Second paragraph, we propose to reduce the percentage-number of visible sprout from 1% to 0.5 %.

Rationale 2: We would like to underline that sprout is a continual growing process. The higher level of the allowance of visible sprout could imply longer storage time. Thus, in order to ensure the freshness at the destination of the garlic, we propose a lower percentage of visible sprout.

In conclusion, the amended text would read: “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~~. In addition, not more than 405% by weight of bulbs may have cloves with externally visible sprouts.”

Section 5.1.3 Class II

Position: We propose to reduce the figure 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.”

Rationale: The higher level of the allowance of visible sprout could imply longer storage time. Thus, in order to ensure the freshness at the destination of the garlic, we propose a lower percentage of visible sprout.

Agenda Item 5, Proposed draft standard for ware potatoes (at Step 7) (CX/FFV 19/21/6)

Section 1 Scope

Position 1: We propose to add the process of “curing”, so the amend text would be read “The purpose of the standard is to define the quality requirements for the ware potatoes after preparation (e.g. brushing and/or washing), curing and packaging.....”

Rationale 1: Curing is an important step of the post-harvest for the ware potatoes which should be addressed in the standard.

Position 2: Third paragraph should be moved to section 2 definition of produce. Consequently, Section 2 Definition of produce should be read

“This Standard applies to commercial varieties of ware potato grown from *Solanum tuberosum* L., of the Solanaceae family, to be supplied fresh to the consumer, after preparation and packaging. Ware potatoes for industrial processing and early potatoes⁷ are excluded.

This standard covers all the commercial varieties of ware potatoes where, the varietal characteristics of tubers vary in:

Shape: from spherical to ovoid and oblong, elongated;

External/skin colour: from white through yellow to tan and from reddish through blue;

Flesh Colour: from white to yellow to blue; and

Depth and colour of the eye cavities: superficial, semi-deep and deep from shades ranging from pink to blue”

Rationale 2: To harmonize with the Layout for Codex Standards for Fresh Fruits and Vegetables

Section 3.1 Minimum Requirements

Position 1: Thailand proposes to delete the provision of “Green coloration; pale green flush exceeding one eighth of the surface area”

Rationale 1: Green colouration is a serious defect of potatoes, its presence indicates the concentrations of solanine in the tuber that can cause health problems, especially to children.

Position 2: We propose to amend this provision as: cracks, cuts, bites, bruises or roughness exceeding 4 mm in depth;

Rationale 2: Bruises may pose risk to food safety.

Position 3: We propose to delete the provision of “superficial common potato scab, i.e. scab spot in all must not extend over more than a quarter of the surface of the tuber”

Rationale 3: The allowance of this type of defect may contradict with another provision of the Minimum Requirement, which indicates “practically free from damage caused by pest”.

Section 4 Provisions Concerning Sizing

Position: The existing sizing should be reviewed to avoid the overlap and gap between size code 2 and 3.

Section 5 Provision Concerning Tolerance

S.No.	Quality Tolerances	Percentage of defective produce, by number or weigh			Rationale
		Extra class	Class I	Class II	
1	Total Tolerances for ware potatoes not satisfying the minimum requirements including defects, of which no more than:		40 5	10	The Extra class of ware potatoes should be of superior quality, so, any defect should not be allowed. For Class I, the tolerance for defect should be less than Class II.
	(a) Frozen, decay, soft rot and/or internal breakdown		1	2	
	(b) Soil and Extraneous matter		0.5	0.5	
	(c) Defects: <ul style="list-style-type: none"> -Brown stains, cuts, bites -Bruises or roughness -Grey, blue or black sub-epidermal stains; > 5 mm deep -Deep common potato scab and powdery potato scab, > 2 mm deep. -Superficial common potato scab > 25% of surface -Sprouts >1mm -Green coloration >1/8 of the surface area -Internal defects including Late blight, bacterial wilt, ring rot and blackheart 				We propose the deletion of tolerances for skin defects of ware potatoes related to diseases from scab and powdery scab, Late blight, bacterial wilt and ring rot. Green coloration should also be removed due to the concern about the presence of solanin. Sprouted tubers contain naturally-occurring glycoalkaloids, which are potentially unsafe for consumption.
2	Additional tolerances				

S.No.	Quality Tolerances	Percentage of defective produce, by number or weigh			Rationale
		Extra class	Class I	Class II	
	(a) Produce belonging to other varieties than marked	2	2	2	
	(b) Size Tolerances-off size from what is indicated/marketed	10	10	10	

Agenda Item 6, Proposed draft standard for fresh dates (at Step 4) (CX/FFV 19/21/7)

Section 1 Scope

Position 1: Thailand proposes to delete the sentence “at the export-control stage”, so, the sentence should be “The purpose of the standard is to define the quality requirements for fresh dates ~~at the export-control stage~~ after preparation and packaging.....”

Rationale 1: To harmonize with the Layout for Codex Standards for Fresh Fruits and Vegetables.

Position 2: Thailand would like to add the stage of maturity of fresh date in this section

Rationale 2: The scope should be made clear on the stage of maturity requirement and be aligned with the section 3.1.1 minimum maturity requirements and to differentiate between this standard and Codex Standard for Date (Codex Stan 143-1985).

Section 3.1 Minimum requirements

Position: Thailand requests to delete the bullet 9 “free of blemished fruit.....”

Rationale: This requirement Blemishes is are allowed in Class I and Class II

Section 3.1.1 Minimum maturity requirements

Position 1: Thailand proposes to amend the provision regarding moisture content as follows:

50-85% for khalal stage)partially ripe(

30-45% for rutab stage)ripe(and

10-25% ~~and less~~ for tamar stage)fully ripe(

Rationale 1: (1) the added words in parentheses () are aimed to classify the stage of ripening. (2) We propose to delete the word “and less” because the percentage of maturity should have a base for determination.

Position 2: Thailand proposes additional parameter on total soluble solid at least 30 °Brix

Rationale 2: General practices in trade use brix content to measure the maturity of fruits and to ensure the sufficient ripeness of fruit.

Section 3.2.1 Extra Class

Position: We would like to propose that the words “and blemished” should be included.

The paragraph should be read as follows: “Date in this class must be of superior quality and they must be characteristics of the variety and/or commercial type. They must be free from defects, and blemished with the exception of very slight superficial defects provided these do not affect.....”

Rationale: For clarity on the type of defects.

Section 3.2.2 Class I /Class II

Position: We would like to separate the sentence in the first bullet “slight defect in shape and colour and” into 2 bullets as follows.

- slight defects in shape;
- slight defects in coloring;

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

Section 4 Provision Concerning Sizing

Position: Thailand would like to amend the table of Size code as follows:

Size Code	Weight/per fruit)g()Khalal(Number of date per 500 g Khalal and Rutab	Number of date per 1000 g)Khalal(
1 <u>A</u>)Extra-Code(15-18	≤45	54-66
2 <u>B</u>)Large(12- <15	46-70	66-84
3 <u>C</u>)Medium(10- < 12	71-100	84-100
4 <u>D</u>)Small(<10	>100	>100

Rationale: (1) To be consistent with previous CCFFV Standard.(2) Thailand produces fresh dates of khalal stage. In current trade practice, the weight per a package of fresh dates in khalal stage is 1000 g, so that, we propose to amend the weight of dates per package from 500 g to 1000 g.

Section 5.1 Total Tolerance

In the table of quality tolerance, we would like to separate the sentence in the third bullet blemished /discolored" into 2 bullets and we propose the percentage as follows.

Quality Tolerance	Extra Class	Class I	Class II
Blemished	3 1	5 2	7 3
discolored	3 1	5 2	7 3

Section 6.1 Uniformity

Position: Thailand proposes to amend the last sentence of this section, hence it should read "Stems presented in clusters or separated from the rachis must be at least 10 cm in length and carry an average of ~~four-six~~ two – six fruits per 10 cm of length."

Rationale: This proposed change is align with the products available for trade in Thailand.

Section 7.2.2 Nature of produce

Position: Thailand proposes to amend the word "Date" to "Fresh date"

Rationale: To align with the name of standard.

Agenda Item 7, Proposed draft standard for yam (at Step 4) (CX/FFV 19/21/8)

Section 2 Definition of Produce

Thailand proposes to amend this section to be, "This standard applies to tubers from commercial varieties of yam of the Dioscoreaceae family obtained from the species *Dioscorea rotundata*, ~~*Dioscorea D. cayenensis*~~, *Dioscorea D. alata*, *Dioscorea D. esculenta* and *Dioscorea D. trifida*, to be supplied fresh"

Section 3.1 Minimum Requirements

- 3rd Bullet: The term "healthy" should be replaced with "sound".

-9th Bullet: We propose to amend the text as follows: "free from damage caused by low temperature and/or high temperature".

Rationale: To be in line with the Layout for Codex Standards for Fresh Fruits and Vegetables

- Thailand proposes to add "Free of damage caused by pests affecting the flesh"

Rationale: This provision is important for the quality of produce.

Section 3.2.2 Class I

First bullet, we propose to amend the text to be as follows: “Cuts or surfaces with scarred ~~wounds~~, as long as they do not exceed 10% of the surface of the product;”.

Rationale: Scars covers all types of defects and in order to provide flexibility in the practices of trade.

Section 3.2.3 Class II

First bullet should be amended to “cuts or surfaces with scarred ~~wounds~~, as long as they do not exceed ~~20%~~ 15% of the surface of the product”

Section 4 Provision Concerning Sizing

Considering the ASEAN Standard for Yam (ASEAN Stan 55-2017), we propose to modify the table of sizing to cover the sizing specified in the ASEAN standard. Hence, the table becomes:

Size Code	Weight (range in g)
<u>1</u>	<u>>2500</u>
<u>2</u>	<u>>2000-2500</u>
3	>1500-2000
4	>1000-1500
5	>400-1000
6	>100-400
<u>7</u>	<u>50-100</u>

Section 5.1.1 Extra Class

Extra Class should be of superior quality. Therefore, decay, soft rot and internal breakdown should not be allowed. So, we propose to delete the sentence “Include therein, is 1% tolerance for decay, soft rot and/or internal breakdown”

Agenda Item 8, Proposed draft standard for onions and shallots (at Step 4) (CX/FFV 19/21/9)

Section 3.1 Minimum Requirements

-Bullet 5: We propose to rewrite this provision as “free from visible mould and yeast”

Rationale: The provision of minimum requirement should be clearly and visual inspection can be observed for safety and quality

-Bullet 8: We suggests rewriting the sentence as “free of externally visible shoot growth, the root must be trimmed close to the base of the bulb”

Rationale: Onion and shallot must be trimmed after harvesting and preparation to ensure safety and quality of produce.

-We proposed additional indents to the minimum requirement as follows: “free of damage caused by low and/or high temperatures”

Rationale: We consider that the minimum requirement on damage caused by low and/or high temperatures is an important quality index.

Section 4 Provision Concerning Sizing

In order to have a better understanding and practicality in trade, Thailand is of the view that the sizing should be presented in table.

Section 5 .1.1 Class I

We propose to rewrite this section as follow: “...Within this tolerance ~~not more than 1 per cent~~ maximum 1% in total may consist of produce”

5.1.2 Class II

We propose to rewrite this section as follow: "...Within this tolerance ~~not more than 2 per cent~~ maximum 2% in total may consist of produce"

Agenda Item 9, Proposed draft standard for berry fruits (at Step 4)(CX/FFV 19/21/10)

Thailand would like to express gratitude towards Mexico and Argentina for preparing the document on *Proposed Draft Standard for Berry Fruits*. Thailand wishes to provide the following specific comments for consideration.

Section 2. Definition of Produce

Thailand proposes adding "Mulberries (*Morus nigra* L., *Morus alba* L., and *Morus rubra* L.)" and "Star gooseberry (*Phyllanthus acidus*)" as these varieties are commonly commercialized trade as well.

Section 3.1 Minimum Requirements

Bullet 4 "practically free from pests² and visible evidence of diseases;":

Thailand is of the view that the word "pests" already covers the meaning of "disease"; hence, Thailand suggests deleting the phrase "and visible evidence of diseases" in order to avoid unnecessary repetition. Therefore, it is suggested to rewrite this provision as follows:

"practically free from pests² ~~and visible evidence of diseases;~~".

Bullet 5 "practically free from damage caused by pests and diseases;":

Thailand would like to provide the same reason raised in bullet 4, deletion of the phrase "and diseases". Thailand, therefore, proposes that the bullet 5 should be amended to read as follows: "practically free from damage caused by pests ~~and diseases;~~"

Thailand suggests adding a new bullet under Section 3.1 as follows: "free from visible mould and yeast". Regarding product quality and food safety, fresh fruits are prone to fungal and/or yeast contamination, resulting in the deterioration, as well as infections or allergies caused by certain yeasts and moulds. As berries are the small fruits, which can be easily contaminated by moulds and/or yeasts.

Section 3.2 Classification

Thailand would like to ask for the clarification of the word "wild berries" which mentioned in Section 3.2.1 Extra Class and Section 3.2.2 Class I; it is suggested to define "wild berries" in Sections 2. DEFINITION OF PRODUCE in order to avoid any confusion.