

**European Union comments on
Codex Circular Letter CL 2016/30-FFV:**

Request for Comments at step 6 on the draft Standard for Aubergines

General Comments

The European Union and its Member States (EUMS) consider that it is not acceptable to have a tolerance for decay in Extra Class. This is not in line with the concept of Extra Class, where the products classified "extra" must be of an exceptional nature. In international trade a tolerance for decay will inevitably lead to products which will not meet the quality requirements after long transportation: decay is progressive and a 1 % of decay at export may lead to a 5 % of decay at destination.

It is therefore necessary to exclude the 1% tolerance for decay, soft rot and/or internal breakdown to keep the superior quality of Extra Class. This will allow fair competition between producers who make an effort to increase the value of their production.

Furthermore, it is necessary to have clear distinction between the 3 classes described in Codex commodity standards for them to be truly meaningful. Allowing for the same tolerance for decay (1%) in both Extra Class and Class I clearly does not achieve this aim.

Specific Comments

Paragraph and section number	Original text	Proposed text	Reason for the change/inclusion
1. Definition of produce	According to their shape a distinction is made between: <ul style="list-style-type: none"> • elongated; • globus/round; and • oval aubergines. 	According to their shape a distinction is made between: <ul style="list-style-type: none"> • <u>elongated aubergines (including club shaped, cylindrical, ellipsoid and pear shaped), and</u> • <u>round aubergines (including globus and oval shaped)</u> 	Distinction between shapes are done in particular to apply the sizing provisions (§ 26 of REP16/FFV). The sizing provisions are identical for globus/round and oval aubergines.
2.1 Minimum Requirements	<ul style="list-style-type: none"> • intact; • provided with calyx and peduncle which may be 	<ul style="list-style-type: none"> • intact • sound; produce affected by rotting or 	Mainly cosmetic changes. Bullet points should be listed according the standard

	<p>slightly damaged;</p> <ul style="list-style-type: none"> • firm; • fresh in appearance; • sound, produce affected by rotting or deterioration such as to make it unfit for consumption is excluded; • clean, practically free of any visible foreign matter; • free of bruising or extensive healed over-cuts; • practically free of pests and damage caused by them affecting the general appearance of the produce; • free of abnormal external moisture, excluding condensation following removal from cold storage; • free of any foreign smell and/or taste; • free of damage caused by low temperature or high temperature. 	<p>deterioration such as to make it unfit for consumption is excluded</p> <ul style="list-style-type: none"> • firm • clean, practically free of any visible foreign matter • practically free from pests • practically free of damage caused by pests • free from damage caused by pests affecting the flesh • free of abnormal external moisture, excluding condensation following removal from cold storage; • free of any foreign smell and/or taste; • fresh in appearance; • free of damage caused by low temperature or high temperature; • free of bruising or extensive healed over-cuts; • provided with a calyx and peduncle which may be slightly damaged 	<p>layout. This will facilitate the use of the standard.</p>
2.2.2 Class I	<ul style="list-style-type: none"> • slight discoloration depending upon the variety; 	<ul style="list-style-type: none"> • <u>slight defect in colouring but not greenish in case of violet varieties</u> 	<p>Clarification.</p>
2.2.2 Class I	<ul style="list-style-type: none"> • slight superficial defects, slight bruising and/or slight healed cracks provided they do not affect the flesh of the fruit. 	<ul style="list-style-type: none"> • slight skin defects including, slight bruising and/or slight healed cracks provided they do not affect the flesh of the fruit. 	<p>Skin defect is more precise than superficial defect and in line with standard layout. Bruising and healed crack are particular skin defects.</p>
2.2.2 Class I		<p><u>new paragraph:</u> They must be practically free from</p>	<p>Sun-scorched are mentioned in class II. In class I, slight superficial (skin) defect are</p>

		sun-scorch	allowed but it is not clear if sun-scorched are included or not. This should be clarified.
2.2.3 Class II	<ul style="list-style-type: none"> • discoloration depending upon the variety; 	<ul style="list-style-type: none"> • defect in colouring but not greenish in case of violet varieties 	Clarification.
2.2.3 Class II	<ul style="list-style-type: none"> • slight bruising and/or slight healed cracks or sun-scorched 	<ul style="list-style-type: none"> • slight bruising, <u>and/or</u> slight healed cracks <u>and/or</u> slight sun-scorched <u>provided they do not affect the flesh of the fruit.</u> 	To clarify that sun-scorched differs from healed cracks and with the limitation for the flesh.
3 Provisions concerning sizing	<p>Aubergines may be sized by diameter, count, length or weight or in accordance with existing trading practices. When sized in accordance with existing trade practices the package must be labeled with the size and method used.</p> <p>The following methods are guides and may be used on an optional basis: Size of the aubergines is determined either based on the maximum diameter of the equatorial (in mm); section on the longitudinal axis or by weight (in g).</p> <p>a) For sizing by diameter the difference between the smallest and largest aubergine in the same package must not exceed:</p> <ul style="list-style-type: none"> • 20 mm for elongated aubergines; • 25 mm for globus/round and oval aubergines. <p>Aubergines of 30 mm in diameter or smaller are not covered by this uniformity rules.</p> <p>b) For sizing by weight the difference between the smallest and largest</p>	<p>Aubergines may be sized by diameter (<u>i.e. maximum diameter of the equatorial section on the longitudinal axis</u>), count, length or weight or in accordance with existing trading practices. When sized in accordance with existing trade practices the package must be labelled with the size and method used.</p> <p>The following methods are guides and may be used on an optional basis: Size of the aubergines is determined either based on the maximum diameter of the equatorial (in mm); section on the longitudinal axis or by weight (in g).</p> <p><u>To ensure uniformity in size, the range in size between produce in the same package shall not exceed:</u></p> <p>(a) For sizing by diameter the difference between the smallest and largest aubergine in the same package must not exceed:</p> <ul style="list-style-type: none"> • 20 mm for elongated 	The methods described are not methods for sizing but to ensure uniformity. It should be clarified when those provisions apply or not.

	<p>aubergines in the package must not exceed:</p> <ul style="list-style-type: none"> • 10 g for aubergines between 20-50 g; • 20 g for aubergines between 50-100 g; • 75 g for aubergines between 100-300 g; • 100 g for aubergines between 300-500 g; • 250 g for aubergines above 500 g. <p>Uniformity in size is compulsory for Extra Class.</p>	<p>aubergines,</p> <ul style="list-style-type: none"> • 25 mm for round aubergines. <p>Aubergines of 30 mm in diameter or smaller are not covered by this uniformity rules.</p> <p>(b) for sizing by weight the difference between the smallest and largest aubergines in the package must not exceed:</p> <ul style="list-style-type: none"> • 10 g for aubergines between 20-50 g; • 20 g for aubergines between 50-100 g; • 75 g for aubergines between 100-300 g; • 100 g for aubergines between 300-500 g; • 250 g for aubergines above 500 g. <p>Uniformity in size is compulsory for Extra Class.</p> <p><u>Uniformity in size is compulsory only for Extra Class and Class I, but not for the aubergines with a diameter equal or below 30 mm.</u></p>	
4.1.1 "extra" class	<p>Five per cent by number or weight, of aubergines not satisfying the requirements of the Class but meeting those of Class I is allowed.</p> <p>Included therein, is 1% tolerance for decay, soft rot and/or internal breakdown.</p>	<p>Five per cent by number or weight, of aubergines not satisfying the requirements of the Class but meeting those of Class I is allowed.</p>	<p>See general comment. Most of the Codex standards do not have tolerances for decay, even in class II produce affected by rotting or any other deterioration rendering it unfit for consumption are excluded. There is no reason to have a higher tolerance for aubergines. Among Codex standards for fresh fruit and</p>

			vegetables, only the standard for apples includes a tolerance for decay in Extra Class. Unless there is an acceptable justification for introducing a percentage for tolerance for decay, soft rot and/or internal breakdown for aubergines, it should not be included.
5.2 Packaging		New paragraph <u>Stickers individually affixed to the produce shall be such that, when removed, they neither leave visible traces of glue nor lead to skin defects.</u>	In line with the standard layout.
6.2.4 Commercial identification	• size.	• size <u>(if sized)</u> .	Sizing is not always mandatory.