

**European Union comments on
Codex Circular Letter CL 2017/13-FFV:
Request for Comments at step 6 on the draft Standard for Garlic**

*Mixed Competence
Member States Vote*

Paragraph and section number	Original text	Proposed text	Reason for the change / inclusion
1. Scope		<p>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:</p> <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. <p>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.</p>	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 	The following commercial types degrees of dryness are covered by the Standard 	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

	<ul style="list-style-type: none"> • Solo Garlic: garlic bulbs that consist of only one clove 	<ul style="list-style-type: none"> • Solo Garlic: The garlic bulbs that may consist of several or only one clove ("solo garlic") 	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 <p>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</p>	<p>free of any foreign smell and/or taste¹</p> <p>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</p>	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	<i>First paragraph, last sentence:</i> The following methods are guides and may be used on an optional basis.	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		New provisions on minimum size: <u>When determined by the maximum diameter of the equatorial section the minimum size shall be:</u> <ul style="list-style-type: none"> <u>• 45 mm for "Extra" Class</u> <u>• 30 mm for Classes I and II.</u> <u>For bulbs not sized by diameter, the minimum size shall be consistent with the minimum diameter indicated above.</u>	For consistency with other standards, provisions on minimum size should be developed.

3 Provisions concernin g 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: • 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	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

	visible sprouts.		
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 <u>or not satisfying the requirements as regards sizing.</u>	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: <u>"Smoked", where appropriate.</u>	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		<p>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</p> <p>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/</p>	<p>Relevant information for producers and traders.</p> <p>Necessity of transparency.</p> <p>This will avoid unnecessary barrier to trade.</p>