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Item 4 (a) of the provisional agenda

REVIEW OF UNECE RECOMMENDATIONS

INSHELL ALMONDS (TRIAL UNTIL NOVEMBER 2007)

Submitted by the United States of America

Following the decision of the UNECE Specialized Section of Standardization of Dry and Dried Produce-(ECE/TRADE/C/WP.7/GE.2/2006/10, pg 5, para 25), extending the trial period of the Recommendation for Inshell Almonds for a year to allow the industry to test the new values in the table of tolerances. The following is the result of U.S. consultations with producers, exporters, importers and inspectors on the lower total tolerances in the minimum requirements.

Since the adoption of the first UNECE Inshell Almond Standard (UNECE STANDARD DF-05) in 1991, the U.S. as the leading global exporter of this commodity has received very few complaints about the physical quality of its inshell almond exports particularly to Europe. The changes proposed in the revised recommendation is seemingly lacking documented scientific or trade information. Furthermore, the recent change in the standard layout while the Recommendation in midst of market trials continues to be very disruptive to the U.S. industry and regulators.

Over the past years the percentage of U.S. Inshell almonds exported to Europe is significant lower than for almond kernels (Table I). The data indicates European demand is primarily for almond kernels. Based on small volume of inshell almonds exported from the U.S. to Europe, we therefore question the need for this UNECE standard, and wonder if the time and other resources spent on the revision of this standard.

Notwithstanding, the U.S. Submits the following comments.

II. Provision Concerning Quality

Issue: Minimum Requirements: (c) The whole produce (shell and kernel)

Comments:

In practice the minimum requirements for the Shell and the Kernel encompasses the whole produce- thus having separate requirements for the whole produce is confusing and redundant. It is advisable that the name of these minimum requirements be changed to "Other Requirements"; for in the Table of Tolerances these defects are placed within the category of "other Defects".

IV. Provision Concerning Tolerances

Issue: Table of Tolerances

Comments:

The defects in the table of tolerances should be more closely aligned with the section on Provision concerning Quality- Minimum Requirements. These should be grouped in the three sections; Shell, Kernel and Other Defects; within each should appear in the same sequence as in the section on Provision Concerning Quality the individual defects.

- The Shell: - There are several varieties of almonds grown in the US. Most almonds marketed inshell are classified as “soft shell” almonds. These softer shells are more prone to cracks, physical damage and adhering hull. Furthermore, the definitions of broken shell and mechanically damaged shell in Annex III (b) Specific definition for nuts(inshell nuts and nut kernels)of the Standard Layout (ECE/TRADE/WP.7/GE.2/2006/Add.1 are somewhat inconsistent characteristics of the products, or with industry and inspection practices.
- Blemishes, discoloration, spread stains and mould: - The characteristics of almond shell makes differentiation between blemishes, discoloration, spread stains and mould on it with the naked eye very difficult or impossible.
- Insect damage: - Insect damage of inshell almonds can only be viewed on the kernel not on the shell. Additionally, it should only be of concern to the edible portion, i.e. the kernel.
- The U.S. recommends the Total tolerances for defects of the shell

Table I
U.S. Almond Exports to Europe

Crop year	Shelled Almonds	Manufactured Almonds ¹	Almonds in other Products ² .	Inshell Almonds	Total Exports to Europe	% Inshell almonds of total exports to Europe
2001/2002	267,302,538	62,820,364	176,000	819,917	331,118,819	0.247
2002/2003	331,704,065	59,989,812	0	1,731,277	393,425,154	0.440
2003/2004	358,787,276	63,592,751	0	2,630,029	425,010,056	0.619
2004/2005	314,900,890	69,735,986	0	2,894,935	387,531,811	0.747
2005/2006	308,638,692	62,997,834	500	1,460,449	373,097,475	0.391
5 yr total	1,581,333,461	319,136,747	176,500	9,536,607	1,910,183,315	0.499

¹ Manufactured: Blanched, sliced, roasted, paste, etc.

² Product: Other products containing almonds.

TABLE II

Tolerances for defects for Inshell Almonds

Defects allowed	Tolerances allowed per cent of defective produce by count, unless otherwise specified		
	Extra	Class I	Class II
(a) Tolerances for produce not satisfying the minimum requirements for the :			
The Shell	10	15	25
of which no more than			
- Cracks and damage to the shell	10	15	25
- Foreign matter and adhering hull	10	15	25
- Blemishes/discoloration/spread stains	1	3	5
- Underdeveloped/shriveled/empty shells	10	15	25
The Kernel	8	10	15
- Mouldy, rancid or damaged by pests, rotting or Deterioration, of which mouldy	2	5	7
- Blemishes/discoloration/gum and brown spot	.05	1	2
- Bitter almonds	3	7	10
- Bitter almonds	1	3	4
Other Defects			
- Foreign matter loose shells, shell fragments, fragments of hull, dust (by weigh)	3	3	3
- Inshell almonds belonging to other varieties than that indicated on the package	5	5	5
- Size tolerances for product not conforming to the size indicated(if sized)	10	10	10
- Live Insects	0	0	0