

## **Economic Commission for Europe**

### **Steering Committee on Trade Capacity and Standards**

#### **Working Party on Agricultural Quality Standards**

##### **Specialized Section on Standardization of Fresh Fruit and Vegetables**

###### **Sixty-fourth session**

Geneva, 18 -21 April 2016

Item 5 of the provisional agenda

###### **Discussion on quality tolerances in marketing standards**

### **Discussion on quality tolerances in marketing standards**

#### **Proposals by the delegation of the United States of America**

##### **U.S. COMMENTS**

The U.S. submits the following comments for consideration as part of the discussion on Agenda Item 5 of the 64<sup>th</sup> Session of the UNECE Specialized Section on Standardization of Fresh Fruits and Vegetables- Discussion on Quality Tolerances in Marketing Standards (Section IV: Provision Concerning Tolerances of the standard layout).

##### **PROVISIONS CONCERNING TOLERANCES**

###### **Issue 1: Simplify Section IV – Provisions Concerning Tolerances and allowances for Class I FFV in Extra Class and for Class II FFV in Class I.**

This section of the standard is too normative and complex to apply for the following reasons:

1. It indicates a total tolerance for defects per class without naming the individual defects and their tolerances. This format is not sufficiently detailed. It is written in a manner that does not enable quick referencing or facilitate allows uniform international application.

**U.S. Proposal:** U.S. proposes to simplify this section of the UNECE FFV standards by placing the tolerances allowed in a table format as done in the UNECE Dry and Dried Produce Standards.

2. The allowances for FFV of the lower classes in the higher ones as currently indicated is confusing- i.e. for if Class I FFV is allowed in Extra Class, and Class II FFV is allowed in Class I; does that mean that Class II FFV can be in Extra Class?. FFV Classes should only be judged on the requirements of a said class. Hence, inclusion of FFV from the lower classes, depresses the overall quality of the lot of produce.

**U.S. Proposal:** The U.S. proposes to discontinue the inclusion of tolerances for produce of the lower classes into the higher ones.

###### **Issue 2: Tolerances for Decay and Internal Breakdown in all FFV Classes**

The inclusion of tolerances for decay, soft rot, or internal breakdown in UNECE FFV standards in all quality classes is necessary to facilitate transparency in trade and the uniform application of the standard internationally. Some of the key reasons for inclusion are as follows:

1. The inclusion is a form of public disclosure that circumvents importers making fraudulent claims of poor quality and importing countries randomly applying low to zero tolerance as an import barrier. The agricultural trade cannot survive in a “zero” tolerance system.
2. Notwithstanding of the quality class, FFV are perishable by nature. Their deterioration (senescence) commences and/or quickens immediately after harvest. Irrespective of the post-harvest technological applied at packing, transportation and distribution stages, senescence is only temporarily slowed down; it cannot be halted.
3. Consumer demands for: (i) wholesome, chemical free FFV and more results in reduced application of agro-chemicals at all stages from farm to fork and (ii) more physiologically developed FFV e.g. as tree ripened fruits, to maximize organoleptic characteristics result in produce being traded with shorter shelf life and more susceptible to the rapid onset of senescence/deterioration – even during transportation.
4. Private trading parties make allowances in their contracts for FFV affected by decay, soft rot or internal breakdown in all quality classes. These contractual allowances set maximum limits (percentages) of decay, soft rot, or internal breakdown that may be present to justify the buyer/importer’s rejection of an FFV lot, or seeking a price adjustment.
5. Irrespective of the quality class, packers/shippers cannot guarantee that every piece/unit of fruit in a lot is perfectly sound. The same physiological issues occurring in the lower classes occur in Extra class as well. While it is understood that “Extra” class is the highest level of quality, with the FFV being packed and handed with utmost care – they are still perishable by nature – and often perish irrespective of that special care.

**U.S. Proposal:** The U.S. proposes the inclusion of Tolerances for Decay and Internal Breakdown in all FFV Classes

### **Issue 3: Tolerances based on characteristic of produce**

Sometimes, during the standard development process, the product characteristics are often overlooked in setting the total tolerances. Rather, they are set based on a pre-set total per class (5% in Extra class, 10% in Class I and II). Consideration of the product characteristics are very important, because highly perishable FFV such as tomatoes and berries, should have total tolerances different from pumpkins or citrus fruits. These highly perishable FFV should have tolerances set for shipping points and another set for destinations. Furthermore, such different tolerances would also be a key factor in the elimination of food loss/waste due to the application of standards at destination.

**U.S. Proposal:** The U.S. proposes that the Specialized Section of the Standardization of Fresh Fruits and Vegetables discuss this issue with a view to making adjustments to the standards of the most highly perishable FFV where appropriate.

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