

## **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 3(i) of the provisional agenda

**Revision of UNECE standards**

### **Revision of UNECE standards – Citrus fruit**

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

##### **U.S. Comments on Citrus Labeling**

###### **General Comment:**

The United States of America is pleased to submit the following comments to the 64<sup>th</sup> Session UNECE Specialized Section on Standardization of Fresh Fruits and Vegetables on proposed changes to the “Marking Provisions” in the UNECE Standard for Citrus Fruits (UNECE FFV-14) Section VI. Provisions concerning markings.

###### **Specific comments:**

The U.S. considers the proposal on Section VI. Provisions concerning markings as too complex and burdensome for the intended purpose. Our key concern remains the inclusion of “selective obligatory markings for some variety groups”.

Such mandatory labelling requirements are in effect a demand that quality inspectors validate species, varieties, variety groups and/or their hybrids – which they are not trained or equipped to do. Gearing in mind an inspection/conformity certificate is a legal document, any errors therein may have dire legal consequences to the issuer (the Inspector). Within the U.S. F&V inspection system, quality inspectors do not validate species, varieties, variety groups and/or their hybrids; they only record such information as indicated on the package. With this in mind the following the following simplified text is proposed:

###### **B. Nature of produce**

Common name of the species if the produce is visible or not visible from the outside:

- Grapefruit
- Indian Sweet Limes
- Lemons
- Mandarins
- Mexican Limes
- Oranges
- Palestine Sweet Lines

- Persian Limes
- Pummelos
- Tangerines

And optionally:

- The name of the variety and/or their hybrids.
  - For mandarin and clementine the indication of “seedless” for varieties having less than 10 seeds.
  - For grapefruit and hybrids: the indication “pink” or “red” where appropriate
  - For pummelos and hybrids: the indication “pink” or “red” where appropriate
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