DRAFT U.S. Positions for the

21st Session of the Codex Committee on Fresh Fruits and Vegetables (CCFFV)
Nuevo Leon, Monterrey, Mexico
October 7 - 11, 2019

PUBLIC MEETING
September 12, 2019, 10am-12:00pm EDT
Room 2-L285 of the Whitten Building,
1400 Independence Ave SW, Washington, DC 20250

AGENDA ITEM 1: ADOPTION OF THE AGENDA CX/FFV 19/21/1

Issue: The Codex Committee on Fresh Fruits and Vegetables (CCFFV) will review the Provisional Agenda and consider its adoption.

Background: The Provisional Agenda was drafted by the Codex Secretariat and the Chair based on outcome of the 20th CCFFV Session, the 41st and 42nd Codex Alimentarius Commission (CAC) Session along with Codex Procedures.

U.S. Position: The United States has no specific comment, but, as a general comment regarding this Committee and its work; we may state at plenary that:

> "The government of the United States is prepared to provide whatever assistance we can to facilitate CCFFV's work to fulfill its mandate under the terms adopted by the Codex Alimentarius Commission".

General Comment: The United States supports the efforts and activities of the CCFFV on their work on standards that reflect international trade practices for the wide range of fresh fruits and vegetables standards being developed and supports the leadership of the many countries that participate in their development.

AGENDA ITEM 2a: MATTERS ARRISING FROM THE CODEX ALIMENTARIUS COMMISION (CAC) AND OTHER COMMITTES CX/FFV 19/21/2

Issue: The Secretariat will inform the meeting of decisions taken by the Codex Alimentarius Commission, Codex Secretariat, and other Codex Committees that impact on its work. The committee is invited to note the matters referred.

Decisions of the CAC regarding CCFFV's work:

U.S. Position: Delegate will address items under relevant agenda items.

AGENDA ITEM 2b: MATTERS ARISING FROM OTHER INTERNATIONAL ORGANIZATIONS ON THE STANDARDIZATION OF FRESH FRUITS AND VEGETABLES CX/FFV 19/21/3

Issue: The Committee will be informed about the activities of other organizations active in the area of standardization for fresh fruits and vegetables.

U.S. Position: None required currently.

AGENDA ITEM 2c: UNECE STANDARDS FOR FRESH FRUITS AND VEGETABLES CX/FFV 19/21/3

UNECE (United National Economic Commission for Europe) standards for fresh fruits and vegetables

- Standard for Garlic
- Standard for Kiwifruit
- Standard for Early and Ware Potatoes
- Standard for Berry fruits
- Layout for Standards on Fresh Fruits and Vegetables

Issue: Existing UNECE FFV Standards for commodities currently being standardized by the CCFFV are provided for reference purposes.

Background: When a UNECE standard exists prior the development of a Codex Standard, the UNECE standard is submitted to the CCFFV for reference purposes to facilitate harmonization of standards.

U.S. Position: We agree with using UNECE Standards as references for the stated purpose.

AGENDA ITEM 3: DRAFT STANDARD FOR KIWIFRUIT (at Step 7)
Tolerance for decay CX/FFV 19/21/4
Comments Received

Issue: The 21st CCFFV Session will discuss tolerance for decay in the Draft Standard for Kiwifruits at Step 7.

Background: The 39th CAC (2016) approved the development of the Standard for Kiwifruit submitted by the 18th CCFFV (2015). The draft standard was discussed at the 19th and 20th CCFFV Sessions (2016-17). The 20th CCFFV re-established an EWG, led by New Zealand, to resolve the remaining outstanding issue - Tolerance for Decay in "Extra" Class.

U.S. Position: 5.1 Quality Tolerances

The United States supports the inclusion of 1.0% tolerance for decay, soft rot and/or internal breakdown in Extra Class.

The United States does not seek the CCFFV's permission or approval for the inclusion of the tolerance in Extra Class- this requirement has been in effect in the U.S. domestic Kiwi standard for 33 years. It has been applied equally to both domestically produced and imported kiwifruits. We will encourage CCFFV to endorse requirements currently in practice.

Rationale: The absence of a tolerance for kiwifruit affected by decay, soft rot or internal breakdown in Extra class means that either "none" of these conditions are allowed, or countries are free to apply tolerance as they wish, thus defeating the purpose of an international harmonized standard.

The United States draws attention to the following key factors to be taken into consideration in setting tolerance for decay, soft rot and/or internal breakdown in Extra Class.

- Tolerance for decay, soft rot and/or internal breakdown in Extra Class has existed in the USDA standard since 1986, in other words, 33 years before this developing Codex standards.

- For Codex standard to be internationally relevant they must reflect trade practices; in this case, it is not reflecting the trade practices in one of the largest kiwifruit markets. The United States holds a significant volume of market share for kiwifruit.

- All fresh fruits and vegetables, including kiwifruits, are perishable by nature regardless of the category of the class.

- No producer, packer, exporter or trader can guarantee that every individual kiwifruit packed is perfectly defect free and will arrive at destination in defect free condition.

- Kiwifruits are stored at 0 to 0.6°C for up to 8 months and as such injury due to nonambient temperatures occurs which leads to decay, soft rot and/or internal breakdown.

- Sometimes non-ambient temperatures occur in transportation and distribution that are beyond the control of the shipper/exporter or trader.

- The United States is a large producer and importer of kiwifruits with vast geographical distances between domestic producers and some domestic markets - up to 1 week by road.

- The import of kiwifruits to the United States can take between 2 to 6 weeks depending on the length of the sea voyages

- It is common global industry practice that after fruits undergo preparation and packaging, they are not always resorted before shipping.

- Due to the flesh color and texture of kiwifruits that obscure internal defects, the U. S.s national standard allows for no more than 1 percent at shipping point and 2 percent at destination for kiwifruit affected by internal breakdown or decay in all three quality classes.

- The food safety concerns expressed concerning tolerances for soft rot, decay and internal breakdown in Extra Class should be extended to all classes of concern.

- If no tolerance (for decay, soft rot and/or internal breakdown) is allowed in Extra Class: the U.S. will make a reservation, citing the inconsistencies of this standard with trade practices and national legislations.

AGENDA ITEM 4: DRAFT CODEX STANDARD FOR GARLIC at Step 7
CL 2017/13-FFV, CX/FFV 19/21/5

Comments at Step 6 CX/FFV 19/21/5 – Add 1.

Issue: The CCFFV will discuss the Proposed Draft Standard for Garlic at Step 7.

Background: The 37th CAC (July 2014) approved as new work a proposal from FFV to develop a Codex standard on garlic. At the 19th (2016) and 20th CCFFV (2017) Sessions there was consensus on the standard except for the inclusion of "smoked garlic. The 20th Session re-established the working group to continue developing the standard in preparation for the 21st CCFFV session. The United States participated in the electronic working group (EWG)'s discussions chaired by Mexico.

U.S. Position: The United States does not support the inclusion of smoked garlic in this FFV standard.

Rationale: In the United States and according to other Codex standards on smoked foods, smoked foods are considered as processed foods since smoking alters both the smell and taste characteristics of the product. During the smoking process, harmful carcinogenic mutagenic substances - Polycyclic Aromatic Hydrocarbons (PAH) may occur.

- Commercial smoked foods are highly regulated in terms of contaminants and residues from the organic matter used in the smoking process.

- Commercial smokehouses and the production of smoked foods are tightly regulated in the United States.

- It is widely accepted that a product (fish, meat, poultry, herbs etc.) that have been smoked as a result of this action has a "slight smell or taste" of smoke- i.e. the characteristics are altered and is no longer considered as fresh.

- In no other fresh food standard (meat, fish, dairy, nuts, fruits and vegetable) smoked products are included and neither is any smoked product sold as "Fresh."

AGENDA ITEM 5: DRAFT CODEX STANDARD FOR WARE POTATOES at Step 7 CX/FFV 19/21/6

Comments at Step 6 - CX/FFV 19/21/6 -Add1

Issue: The CCFFV will discuss the Proposed Draft Standard for Ware Potatoes at Step 7.

Background: The 37th CAC (July 2014) approved as new work the CCFFV proposal for new work to develop a Codex standard for ware potatoes. The development of this standard is led by India, who originally proposed this work, and co-chaired by France. The draft was discussed at the 20th CCFFV Session (Oct. 2017) and returned to the e-working group for continued development and will be discussed at the 21st CCFFV at Step 3.

The U.S. comments are based on more than 100 years (since 1917) of ware potato inspection experience, trade practices and product characteristics.

3.2 Classification **Ware potatoes are classified into "Extra" Class,**

U.S. Position: Based on our extensive experience in ware potato production, standardization and inspection, the United States objects to the inclusion of Extra Class in this standard.

Rationale: Ware potatoes are produced in the soil. As such, their shape and size characteristics are heavily influenced by the soil types and soil preparation.

The production practice for potatoes is not to cultivate potatoes in the same field for two years in succession due to soil depletion and increased risk of diseases.

5. Provisions Concerning Tolerances - Tolerances for Decay etc. in "Extra" Class:

U.S. Position: If CCFFV decides to maintain Extra Class in the standard, the United States recommends the inclusion of tolerances for "Frozen or affected by soft rot or wet breakdown" of 1.0% for ware potatoes in Extra Class.

Rationale: Tolerance for frozen, decay, soft rot and/or internal breakdown in Extra Class exists in the USDA standard since 1917 (102 years). This is a well-established trade practice for imports and exports of ware potato. There have been no issues with trading partners.

Quality Tolerances –Maximum sprouts length of 1 mm.

U.S. Position: The United States proposes changing the provision for from sprouts > 1mm to sprouts > 3mm in length, provided that the tuber remains firm for the following reasons:

Rationale: Sprouts in ware potatoes are not a serious problem until they attain the minimum length of 3mm and are accompanied by softening of the tuber.

In many cases, sprouting occurs overnight and by the following day they can be longer than 1mm without affecting the edibility or safety of the tuber.

The maximum proposed length of 1 mm for sprouts has the potential for fraudulent application by importer whose ware potatoes imports undergo long sea voyages or do not have the appropriate storage facilities.

Research by exporters indicate (i) that sprouting at destination largely results from improper storage and handling after the potatoes are removed from refrigerated shipping containers, and (ii), the length of time, in terms of number of days, between removal from the refrigerated shipping container, arrival upon destination and time of quality inspection/assessment--the longer the duration, the longer the sprouts.

Tolerance for Green Coloration:

U.S. Position: The method for evaluating greening should be consistent with trade practices and is dependent on percentage of the tuber that is unusable due to peeling off the affected area. Additionally, a single limit for all three classes of 12.5% or 1/8 of the surface is impractical and unreasonable; therefore, the following is proposed:

Class I: When removal of the green area results in a loss of more than 5 percent of the total weight of the potato or when green color affects more than 25 percent of the surface in the aggregate.

Class II: When removal of the green area results in a loss of more than 10 percent of the weight of the potato or when green color affects more than 50 percent of the surface in the aggregate.

Rationale: Greening and the resulting glycoalkaloids naturally occur in potatoes, due to chlorophyll production in tubers when exposed to light during growth; also referred to as "sunburn." Natural low levels of glycoalkaloids contribute to the flavor of potatoes.

Other causes of elevated levels of glycoalkaloids in potatoes include physical damage, age, and light exposure; however, greening by itself does not necessarily indicate increased glycoalkaloid levels, as greening and glycoalkaloid levels can occur independent of each other.

The General Standard for Contaminants and Toxins in Foods does not cover the presence of endogenous natural toxicants, such as glycoalkaloids in potatoes. The Codex standard for frozen French fries treats greening as a "visual defect" issue but does not set a zero tolerance for greening on potatoes.

The mean toxicity response in humans for glycoalkaloids is equivalent to the consumption of 3 mg/kg per body weight. If a potato contained glycoalkaloids at the advisory level of 200 ppm, an 80 kg person would have to consume an entire kilogram of the affected areas of a potato per serving to trigger a toxic response. A serving of potatoes with this high a level of glycoalkaloids would have a bitter, burning taste, making them unpleasant to eat.

Greening is not some invisible food borne illness: greening that occurs on potatoes is clearly visible and very bitter tasting. If consumers prefer not to consume green or otherwise discolored potato, they can easily avoid this through visual detection and/or by recognizing a difference n taste.

We respectfully ask countries opposing such inclusion to inform CCFV on levels in their national legislation and circulate this information to CCFFV.

Allowance for Soil and Extraneous matter:

- Not all potatoes are washed as part of their post-harvest treatment to prevent introducing conditions that will lead to soft rot, wet rot, internal breakdown and decay.
  As a product that comes from the part of the plant that is covered in soil, incidental soil is expected.

AGENDA ITEM 6: PROPOSED STANDARD FOR FRESH DATES at (Step 4) CX/FFV 19/21/7

COMMENTS at Step 3. CX/FFV 19/21/7- Add1

Issue: The 21st CCFFV will discuss the draft standard for Fresh Dates prepared by the EWG led by India.

Background: The 39th CAC (July 2016) approved India's proposal to 19th CCFFV (Oct. 2016) to develop a Code standard for fresh dates. The draft standard was then discussed at the 20th CCFFV and returned to Step 3 for further revision in preparation for consideration at the 21 CCFFV Session (2019).

U.S. Positions:

2. Definition of Produce

For clarity, the United States recommends that the forms of presentation /styles of dates moved from Section 6.1 Uniformity and placed as the second paragraph of the Definition of Produce and written as follows:

Definition of Produce:

This Standard applies to commercial varieties of Dates (*Phoenix dactylifera* L. from Arecaceae family), to be supplied fresh and whole to the consumer in unpitted form after preparation and packaging. Dates intended for industrial purposes are excluded.

Dates may be presented:
• in clusters (consisting mainly of the rachis and the stems to which the fruit is attached naturally);

• in stems (stems which are separated from the rachis and to which the fruit is attached naturally);

• [Separated in individual fruit, arranged in layers, or loose in the package].

Stems presented in clusters or separated from the rachis must be at least 10 cm in length and carry an average of 4 to 6 fruits per 10 cm of length.

3. Provisions Concerning Quality
3.1 Minimum Requirements

U.S. Position: Text from bullet 4 ("insect and mites eggs including the presence of dead insects and mites, their debris or excreta") should be deleted.

Rationale: This concept is already implied in bullet 5, "Practically free of pest damage." Pest damage is defined as:

"Physical injury to, or detraction in appearance of the product caused by pest (insects, mammals, birds etc.) feeding/gnawing, or insects living on or in the FF&V; or the presence of dead pest at any stage of development."

U.S. Position: The text in Bullet 6 "free from fungal growth" should be deleted.

Rationale: Fungal growth is implied in Bullet 2 "sound,"

There is no correlation between this minimum requirement and the Table of Tolerances for defects allowed.

3.1.2 Maturity Requirements

U.S. Position: The United States recommends that CCFFV evaluate whether all date varieties at the tamar stage are considered as "fresh" when the moisture content indicated (10 – 25%) is lower than those for dried dates.

Rationale: In the draft proposed Codex standard for fresh dates, the moisture content of 10-25% at the tamar stage is lower than the moisture content of 26.0 per cent for cane sugar varieties of dried dates in the following standards used in trade:

- Codex Standard for Dried Dates (CODEX STAN 143-1985),
- United Nations Economic Commission for Europe (UNECE) DDP-08 of 2015,
- U.S. Standards for Grades of Dates, -effective Aug. 26, 1955.

AGENDA ITEM 7: PROPOSED DRAFT STANDARD FOR YAMS at Step 4
CX/FFV 19/21/8

Comments CX/FFV 19/21/8-Add 1

Issue: The CCFFV will discuss the draft standard for yams prepared by the E-WG chaired by Costa Rica and co-chaired by Ghana.

Background: The 20th CCFFV Session (2017) agreed to establish an EWG chaired by Costa Rica and co-chaired by Ghana, working in English and Spanish; to prepare, subject to the approval of the 41st Codex Alimentarius Commission (2018), the proposed draft standard for yam for distribution. The text for discussion is based from E-WG deliberations.

Definition of Produce

U.S. Position: The United States recommends adding a second paragraph within the Section 2 Definition of produce as follows:

- The flesh color of yams may be white, ivory, yellow or purple.
- The skin of yams may be of various shades of brown purplish-brown and brownish-black. It may also be corky, rough or smooth, racked/split, but not exposing the underlying flesh, light skinned, or slightly transparent through the skin color of the flesh, as flesh color may vary.

Rationale: The flesh of yams varies in color and in some varieties the color may show through the skin.

The skin texture of yams varies based on variety and sometimes by production method. Most common skin textures are smooth, rough/coarse, corky and cracked/split but not exposing the underlying flesh.

Minimum Requirements

U.S. Position: 2nd Bullet - "fresh in appearance."

The United States recommends amending the text "fresh in appearance" with the following text:

- Cured skin: In some yam varieties, corky skin, feathering of the cured skin and/or skin cracks that do not extend into the flesh are not considered as defects.

Rationale: The phrase "fresh in appearance" is not suited for yams because of their skin varietal characteristics, when cured can be corky, hardened, having a brown, purplish, or black colors, with groves/striations that do not extend into the flesh. Some yams have naturally occurring cracked skin. The cured skin of some varieties (cuticle layer) are prone to feathering. These mentioned characteristics conflict with the interpretation of "fresh in appearance."

U.S. Position: Fourth Bullet – "clean, practically free of any visible foreign matter".

The United States recommends amending the text to excluding packing/cushioning materials as follows:

- Clean, practically free of any visible foreign matter; excluding coconut fiber/coir, saw dust, shredded paper and other materials used for protective packaging/cushioning during transportation.

Rationale: Yams being shipped are often packed with protective cushioning material such as coconut fiber, saw dust/dried wood pulp and shredded paper to prevent breakage.

3.2 Classification:

U.S. Position: The United States recommends omitting "Extra" Class from the draft standard.'

Rationale: The physical characteristics of yams, their method of production, harvest, post-harvest and trade practices do not allow using this class.

U.S. Position: The requirements indicated for all three classes are overly restrictive and overlook the following factors:

(i) The skin of yams differs widely in color, thickness, texture and firmness; therefore, the severity of skin bruises, scratches and other defects mainly depend on the yam variety.

(ii) In most yam varieties, unless damage to the skin reaches the flesh, the damaged skin heals completely without progressing to the flesh. The skin of yams is not eaten. In some varieties that are cooked with the skin, the skin is peeled off before the

yam is consumed.

(iii) Many yam varieties with hard and thick skins do not display any external signs of pest damage of diseases affecting the skin unless deterioration is advanced, begin to affect the flesh or upon cutting/ or food preparation.

(iv) Skin bruises, scratches and cuts are common in yams because they are harvested manually using gardening implements (spades, forks, and other type diggers). Yam harvesting is laborious, requiring concentration by harvesters who bend, squat, kneel and /or sit on the ground to avoid damaging the tuber. Depending on the size of the yam, planting method used, and soil type, and given that more than one harvester is required, there exists an increased probability of damage to the product.

4. Provisions Concerning Sizing

Position: The United States recommends expanding the table with more graduated weight ranges as follows:

Size Code	Weight (range in Kg)
A	> 8
B	>6 - 8
C	>4 - 6
D	>2.5 - 4
E	>1.5 – 2.5
F	>1- 1.5
G	>0.4 – 1
H	≤0.4

Rationale: The proposed weight range for Size Code A (1.5 kg and larger) in the sizing table is too broad and will pose problems in trade and for conformity assessment. Yams in international trade size vary from about 175 g to of 5 kgs and larger. Therefore, we recommend a more gradual approach to sizing.

AGENDA ITEM 8: PROPOSED DRAFT STANDARD FOR ONIONS AND SHALLOTS at Step 4 CX/FFV 19/21/9

COMMENTS CX/FFV 17/21/9- -Add1

Issue: The CCFFV will discuss the Proposed Draft Standard for Onions and Shallots.

Background: At the 20th CCFFV (2017) session, the Islamic Republic of Iran presented a proposal to develop a standard for onions, and Indonesia presented a proposal for shallots. The 20th CCFFV Session noted that both products were closely related, so the proposals were combined and submitted jointly (onions and shallots) for approval by 41st CAC (2018.) CCFFV subsequently established an EWG chaired by Iran and co-chaired by Indonesia and India.

2. Definition of Produce – shape and color

U.S. Position: Shape - The United States recommends elaborating further the shape description for more detail. The following sentence is proposed:

- Onions and shallots may be of the following round shapes: spherical, flattened round oval/elongated, and top/conical

Color - The United States recommends the color description be simplified as follows:

- Onions and shallots are of the following colors: white, purple, red, grey or yellow.

3.1.1 Sufficiently Developed

U.S. Position: The United States recommends including a section on "Sufficiently Developed" and a definition for onions and shallots in the standard to facilitate uniformity.

- 3.1.1 Sufficiently Developed: Onions and shallots must be sufficiently developed. They must be firm, not soft or spongy and have outer scales that are dry and papery.

3.2.1 Class I

U.S. Position: For consistency with trade practices, onions and shallots in Class I should be free from doubles. Therefore, we recommend that the following text be included as a subpart of the fourth indent.

- Free from doubles.

4. Provisions Concerning Sizing

U.S. Position: For clarity, the United States recommends two subsections (4.1.a and 4.1.b) to separate proposed sizing provisions for onions and shallots::

4.1. Onions and shallots may be sized by the maximum diameter of the equatorial section, or in accordance with existing trade practices. When sized in accordance with existing trade practices, the package must be labelled with the size and method used. The following sizing provisions are a guide and may be used:

a: Onions

The minimum diameter shall be 10 mm.
To ensure uniformity in size, the range in size between onions in the same package shall not exceed:

- 5 mm where the diameter of the smallest onion is 10 mm and over but under 20 mm. However, where the diameter of the onion is 15 mm and over but under 25 mm, the difference may be 10 mm
- 15 mm where the diameter of the smallest onion is 20 mm and over but under 40 mm
- 20 mm where the diameter of the smallest onion is 40 mm and over but under 70 mm
- 30 mm where the diameter of the smallest onion is 70 mm or over.

b: Shallots

The minimum diameter shall be:
- 10 mm for grey shallots and
- 15 mm for other shallots.

The maximum diameter shall be:
- 55 mm for round shallots and
- 60 mm for demi-long and long shallots.

To ensure uniformity in size, the range in size between shallots in the same package shall not exceed:

- 10 mm where the diameter of the smallest bulb is 10 mm and over but under 15 mm;

- 15 mm where the diameter of the smallest bulb is 15 mm and over but under 20 mm;
- 20 mm where the diameter of the smallest bulb is 20 mm or over.

AGENDA ITEM 9: PROPOSED DRAFT STANDARD FOR BERRY FRUITS at (STEP4) CX/FFV 19/21/10

Comments CX/FFV 19/21/10 -add. 1

Issue: The 21st CCFFV session will discuss the draft standard for berry fruits at Step 4.

Background: The 20th session of the CCFFV (2017), considered a new work proposal submitted by Mexico for the development of a horizontal Standard for berry fruits. CCFFV20 (2017) agreed to submit the following proposal for approval by 41st CAC (2018) and subsequently established an E-WG, chaired by Mexico and co-chaired by Argentina, working in Spanish and English, to prepare a standard for distribution at step 3. The United States participated in this electronic working group.

3.1 Minimum Requirements

U.S. Position: The United States recommends including the following minimum requirement:

- The peduncle on non-panicle berries may be missing provided the break is clean and juice is not leaking from the breakpoint.

Rationale: Many non-panicle berries are harvested mechanically with the peduncle breaking at either the fruit end or at the tree branch end. Berries without a peduncle are accepted in trade provided that the break is clean, and the fruit is not leaking juice from the peduncle separation point. Increasingly, berries with attached peduncle in trade are specially ordered.

3.1.1 Minimum Maturity Requirements

U.S Position: The United States recommends including the following sentence in this section:

- Some berry fruits such as gooseberries may be presented at hard ripe.

Rationale: Some berries, for example, gooseberries, are harvested at the hard ripe (plump, fully colored and firm), but will eventually soften. This berry fruit characteristic must be reflected in the standard to avoid being classified as under-developed or unripe.

3. Classification:

3.2 .1 Extra Class

U.S. Position: The United States recommends omitting Extra Class from the standard.

Rationale: We question the inclusion of Extra Class for such highly perishable commodities in the standard and note that from our experience, Extra Class is not widely used in domestic, import and export trade involving the United States.

Class requirements

U.S. Position: We propose the following amendments to Classes:

3.2.1. "Extra" Class.

If "Extra" Class is retained, the following changes are proposed to the requirements– after opening sentence insert:

- Bilberries and blueberries should be practically free of agglomerated berries and must be practically covered with bloom, according to the varietal characteristics.
- Red and white currant panicles must be completely filled.
- Black currant panicles may not be completely filled and single berries are allowed.

3.2.2. Class I: After opening sentence insert the following

- Red and white currant panicles should be nearly filled.
- Black currant panicles may not be completely filled, and single berries are allowed.

3.2.2. Class II: After opening sentence insert:

- Currant (red, white and black) panicles may be less evenly spaced.
- Indent 4- Leakage of juice:
  The indent should read *"Slight leakage of juice"* to correctly reflect consumer preferences and trade practices. The original text is too broad.
- Indent 5- Slight samples of rot;
  The indent should read "*Slight early signs of mildew"* to correctly reflect consumer preferences and trade practices. Rot is addressed in Section 5 on Provision Concerning Tolerances.

  The uniformity of sizing should be consistent with point (A).

Section "Extra" Class

U.S. Position: If Extra Class is retained, the United States recommends including a tolerance for decay, soft rot and/or internal breakdown of berry fruits as follows:

- Included therein, is one percent (1.0%) tolerance for decay, soft rot and/or internal breakdown.

Given the highly perishable nature of berry fruits, their physiological characteristics, harvest and post-harvest practices, the absence of a tolerance for decay, and soft rot and/or internal breakdown, "Extra" Class may result in nullifying its use in international trade.

Section 6.1 Uniformity

U.S. Position: We recommend aligning the second paragraph texts with that of the CCFFV Standard Layout and adding the following last bullet:

- However, a mixture of berries of distinct species and/or varieties may be packed together in a sales package, provided they are uniform in quality and for each species in origin. Berry fruits in Classes "Extra" and I must be practically uniform in ripeness.

- The visible part of the contents of the package must be representative of the entire contents.

AGENDA ITEM 10: DISCUSSION PAPER ON GLOSSARY OF TERMS USED IN CCFFV STANDARDS CX/FFV 19/21/11

Issue: The 21st CCFFV will deliberate on a Discussion Paper on "Glossary of Terms used in the Layout for CCFFV Standards" prepared by the United States.

Background: At the 19Th CCFFV Session (2016), Mexico recommended to develop a Glossary of Terms for CCFFV standards. A working group led by Mexico developed the first draft, which was presented at the 20th CCFFV Session. Based on the outcome at the 20th CCFFV session, the United States offered to lead the work to continue developing the Glossary of Terms as a Discussion Paper.

U.S. Position: The United States supports the development of the Glossary of Terms and will diligently seek to ensure that term definitions are correctly described within the context and use of the standard for agricultural commodities, leading to international harmonization, appropriate interpretation and implementation of the provisions in CCFFV standards.