

Specialized Section on Standardization of Fresh Fruit and Vegetables

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Item 6 (d to j) of the provisional agenda

## **NEW UNECE STANDARDS**

### Justification for new UNECE standards

This note, submitted by Germany, provides justification for developing new UNECE standards.

Pursuant article 2a of Regulation (EC) No 1580/2007 a general marketing standard is introduced in the EC law by 1 July 2009. This general standard covers most of the fruit and vegetable species traded on the fresh market and contains provisions on minimum requirements, tolerances and marking, but no classification. The general marketing standard guarantees that the fruit and vegetables on the market are sound, fair and of marketable quality.

From the point of view of the industry, the following aspects are missing in the general standard:

- classification.

In the fruit and vegetables sector, the sale based on classification has proven its value for a realistic price fixing and a well functioning of the market.

Classes, defined as a minimum quality, guarantee a fair competition – but only if they are recognised and applied as a binding measure for comparison.

- product specific provisions.

Due to its shortness and generalization, the general standard is not specific enough for the majority of products. This becomes obvious in comparison to specific marketing standards. The general standard is mostly more strict than the UNECE standards.

Article 2a of Regulation (EC) No 1580/2007 contains one option to comply with the wishes of the industry and to compensate for the weaknesses of the general standard: In case the holder is able to show that the product is in conformity with any applicable UNECE standard, the product shall be considered as conforming to the general marketing standard. This is valid especially when the product specific UNECE standard allows more defects than the general standard.

Thus, new rules on competition are introduced in the EC law:

- For products covered by the general marketing standard the marking of a class is neither intended for nor explicitly excluded.
- For products covered by the general marketing standard and labelled with a class, the UNECE standard is the measure of comparison.
- The UNECE standards for fresh fruit and vegetables (potatoes being excluded) and for nuts become a legally binding character without being explicitly part of the EC law. This is especially the case, when a product does not meet the general marketing standard. In those cases the more generous, product specific UNECE standard may be applied to cure a violation against the general standard.
- In case a private standard is applied and no UNECE standard exists for the relevant product, this private standard may not be used to cure a violation against the general standard.

The structure and content of the UNECE standards are well known in the EC as the existing marketing standards and the UNECE standards are 100 per cent identical. The standardisation bodies of the EC Commission and the UNECE did cooperate very well during the last years in order to guarantee a perfect harmonisation of the standards.

The new position of the UNECE standards in EC law reveals only one weakness: the 50 UNECE standards cover a broad range of products, but they show gaps in the case of products of regional relevance or products of a traded volume below the volume of products that have been standardised since now.

Therefore, German producers did suggest, to developing and approving new UNECE standards in 2009 if possible. These new standards are needed as a basis for classification of these new products.

First proposals made by German producers are related to standards for lambs lettuce, kohlrabi, rocket, kale, chard, pak-choi, parsnips, Hamburg parsley, radishes, turnip tops, beetroot, fresh herbs, currants, blackberries, gooseberries. This would be 15 new standards in a first approach. More proposals are on the wish list for the next years.

The industry may express their needs and justify their request. But new UNECE standards can only be proposed and approved by governmental representatives. Arguments supporting an application could be the volume of production, economic importance in intra and extra-trade of a country or region, definition of characteristics of the product.

For products on that wish list it is difficult or nearly impossible to provide for statistics of production or import/export. These products are specialities or niche products that are mainly covered by CN codes summarizing a number of products (table 1). Examples: lambs lettuce is covered by CN code 0709 90 10 „other lettuce than *Lactuca sativa* or chicory“. This CN code covers in addition rocket and dandelion. Kohlrabi is covered by CN code 0704 90 90 „other cabbage“ comprising in addition savoy cabbage, Chinese cabbage, broccoli, kale etc. The statistical data for parsnips and Hamburg parsley are covered by CN code 0706 90 90 „other turnips“ summarising in addition beetroot, radishes and bulbous chervil. Chard, pak choi, turnip tops and other stalk vegetables that could be interesting for standardisation are covered by CN codes 0704 90 90, 0706 90 90, 0709 40 00, 0709 90 10, 0709 90 20, 0709 90 90 – all being mixed codes that do not allow a product specific evaluation.

However, valid arguments for new UNECE standards for those specialities are the necessity for product specific standards and the definition of minimum quality. These standards must define the typical characteristics of the product and – where necessary and with caution – the deviation from the minimum requirements. Provisions on uniformity or mixtures of varieties and/or commercial types could be of relevance too. The UNECE standards – in their capacity as minimum standards – may provide the general guideline for fair competition and well functioning and development of the markets for those specialities – in national and international trade.

A standard setting body such as the UNECE could be interested in a long list of standards – especially when the total number of standards is good for the reputation of the relevant body.

But the UNECE does not define its quality and importance by the number of their standards. The quality and necessity of the standards is more important. It does not make sense to develop standards of limited interest for the industry. Such insignificant standards will not be updated, are quickly out of date and sink into a doze – they do exist but they are not applied.

It is important to avoid those mistakes by developing only those product specific standards where the product is economically important or has special characteristics. In all other cases, it should be checked whether several products could be combined in a standard for a product group. In those standards for product groups, products with similar characteristics and irrespective their volume produced or marketed would be combined. Thus an essential precondition for the application of the standard and its long lasting usefulness and updating could be guaranteed.

The requests of the German producers for new UNECE standards could be realised as follows: a product specific standard for lambs lettuce, rocket and kohlrabi and for the product groups root vegetables, tubercle vegetables, stalk vegetables and berry fruit.

### **Proposal for a new UNECE standard for lambs lettuce**

Lambs lettuce (*Valerianella locusta*) requires a product specific UNECE standard because of the special presentation in rosettes, "trimmed" or "untrimmed" as well as "washed" and "unwashed". In case of "unwashed" lambs lettuce the limit allowed for soiling has to be defined. In addition to that the limit for damaged leaves should be defined. Two classes and no provisions on sizing are proposed.

### **Proposal for a new UNECE standard for rocket**

Rocket (*Eruca sativa*, *Diplotaxis tenuifolia*, *Diplotaxis muralis*) requires a product specific UNECE standard defining the presentation as single leaves. In addition the limit for damaged leaves should be defined. Two classes and simple provisions on sizing are proposed.

### **Proposal for a new UNECE standard for kohlrabi**

Kohlrabi (*Brassica oleracea* var. *gongylodes*) requires a product specific UNECE standard defining the presentation "with leaves" and "without leaves" as well as the limit for damaged leaves and cracks in the product. Two classes and simple provisions on sizing are proposed.

### **Proposal for a new UNECE standard for root vegetables**

The requirements for root vegetables are in principle the same as for carrots. For obvious reasons a UNECE standard for root vegetables is proposed. This standard could comprise parsnips (*Pastinaca sativa*), Hamburg parsley (*Petroselinum crispum* var. *tuberosum*), bulbous chervil (*Chaerophyllum bulbosum*), and salsify (*Tragopogon porrifolius*). The UNECE standards for carrots FFV-10, horse-radish FFV-20 and scorzonera FFV-33 should be integrated. In case of root vegetables, the presentation "with/without leaves" has to be defined as well as the limit for broken and/or cracked roots. In addition to that it has to be defined which of the species is regularly marketed without their tips (e.g horse-radish, parsnip, Hamburg parsley). Two classes and simple provisions on sizing are proposed.

### **Proposal for a new UNECE standard for tubercle vegetables**

The requirements for tubercle vegetables are in principle the same as for radishes. For obvious reasons a UNECE standard for tubercle vegetables is proposed. This standard could comprise beetroot (*Beta vulgaris*), turnips (*Brassica rapa*), swedes (*Brassica napus* subsp. *rapifera*) and celeriac (*Apium graveolens* var. *rapaceum*) and in addition to that the UNECE standard for radishes FFV-43. In case of tubercle vegetables the limit for acceptable cracks would have to be defined as well as the presentation with or without leaves and with or without the rootlet attached. Two classes and simple provisions on sizing are proposed.

### **Proposal for a new UNECE standard for stalk vegetables**

The requirements for stalk vegetables are in principle the same as for ribbed celery and rhubarb. For obvious reasons a UNECE standard for stalk vegetables is proposed. This standard could comprise chard (*Beta vulgaris* ssp. *cicla* var. *flavescens*), pak choi (*Brassica rapa* chinensis-group), cardoon (*Cynara cardunculus*), catalogna (*Cichorium intybus* var. *foliosum*) and dandelion (*Taraxacum officinale*) and could integrate the UNECE standards for ribbed celery FFV-12 and rhubarb FFV-40. For stalk vegetables the presentation with or without leaves, as plant or single stalks as well as the limit for damaged stalks should be defined. Two classes and simple provisions on sizing are proposed.

## **Proposal for a new UNECE standard for berry fruit**

The German producers did request UNECE standards for currants, blackberries and gooseberries. As the provisions would be very similar for those fruit and the existing standards for raspberries and bilberries/blueberries, it is proposed to develop one UNECE standard for berry fruit. This standard could comprise black berries (*Rubus fruticosus*), boysenberries (*Rubus loganobaccus*), currants (*Ribes rubrum*, *R. nigrum*), gooseberries (*Ribes uva-crispa* var. *sativum*), lingonberries (*Vaccinium vitis-idaea*), and cranberries (*Vaccinium macrocarpon*) and could integrate the UNECE standards for bilberries/blueberries FFV-07 as well as for raspberries FFV-32. For berry fruit and depending on the species, the minimum maturity level ("hard ripe"), limit for bruises and eventually a tolerance for worm eaten fruit should be defined. Two classes and simple provisions on sizing are proposed.

## **Outlook**

Based on the new regulation on standards being applied from 1 July 2009 in the EC, the governments of the EU member states should feel obliged to support the requests of their industry for new UNECE standards. This would not exclude any check and co-ordination with all parties concerned – industry and consumers. New UNECE standards for single products or groups of products are necessary to avoid the risk that certain products might not meet the requirements of the general standard because of their special characteristics.

From the point of view of the European industry, the trial period for recommendations should be avoided. A trial in the EU is only possible if the standard is approved as standard, the recommendation does not count. In case these standards would need some corrections, they could be amended at any time and following their practical application.

These proposals for new standards will be submitted to UNECE in short term, to allow a deep and constructive discussion at the next session in Geneva. This intense preparation might hopefully lead to a successful implementation of new UNECE standards.

<b>Table 1</b>	<b>world production</b>	<b>import Germany</b>	<b>export Germany</b>	<b>import EC</b>	<b>export EC</b>
lamps lettuce, rocket, dandelion etc.		130.504 t	21.372 t	517.505 t	453.644 t
kohlrabi etc.		99.986 t	15.419 t	293.546 t	258.833 t
carrots etc.		201.980 t	28.170 t	930.886 t	765.704 t
horse-radish		4.337 t	1.358 t	13.002 t	903 t
celeriac		10.069 t	3.479 t	65.588 t	54.119 t
other root vegetables		44.359 t	16.683 t	182.151 t	14.973 t
<b>root and tubercle vegetables, in total</b>		<b>260.745 t</b>	<b>49.690 t</b>	<b>1.191.627 t</b>	<b>835.699 t</b>
ribbed celery		7.396 t	3.225 t	98.413 t	98.116 t
chard and cardoon		2.838 t	103 t	7.901 t	8.543 t
dandelion, lambs lettuce, rocket etc.		130.504 t	21.372 t	517.505 t	453.644 t
pak-choi etc.		99.986 t	15.419 t	293.546 t	258.833 t
<b>stalk vegetables, in total</b>		<b>240.724 t</b>	<b>40.119 t</b>	<b>917.365 t</b>	<b>819.136 t</b>
raspberries, blackberries	1.192.000 t	15.291 t	898 t	73.700 t	47.900 t
currants	888.000 t	4.518 t	888 t	10.300 t	9.900 t
blueberries, cranberries	604.000 t	2.534 t	861 t	34.000 t	20.000 t
gooseberries	119.000 t	1.483 t	66 t	3.700 t	2.300 t
<b>berry fruit, in total</b>	<b>2.803.000 t</b>	<b>23.826 t</b>	<b>2.713 t</b>	<b>121.700 t</b>	<b>80.100 t</b>
<b>Comparison to other produce covered by UNECE standards</b>					
<b>apricots</b>	<b>3.013.000 t</b>	<b>35.407 t</b>	<b>1.344 t</b>	<b>111.900 t</b>	<b>114.100 t</b>
<b>cherries</b>	<b>3.154.000 t</b>	<b>41.921 t</b>	<b>8.054 t</b>	<b>60.000 t</b>	<b>9.400 t</b>
<b>kiwi fruit</b>	<b>1.204.000 t</b>	<b>134.829 t</b>	<b>9.184 t</b>	<b>260.900 t</b>	<b>139.100 t</b>