Economic Commission for Europe  
Committee on Trade  
Working Party on Agricultural Quality Standards  
Specialized Section on Standardization of Fresh Fruit and Vegetables  
Sixty-third session  
Geneva, 21-24 April 2015  
Item 5 (a) of the provisional agenda  
Revision of UNECE standards

Revision of UNECE standards - Citrus fruit

Comments by the delegation of the United States of America

The following comments were submitted by the delegation of United States of America.

General Comment:

The United States of America is pleased to submit the following comments on the report of the Citrus Working group to the 63rd Session of the 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:

Though Citrus Working group made considerable progress at its November 6, 2014 meeting; the U.S considers the output as still too complex and burdensome for the intended purpose. Additionally, for consistency with international customs regulatory requirement, “the contents of each package must be indicated on the package. With these two issues in mind 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 Limes
- Persian Limes
- Pummelos
- Tangerines

And optionally:

- The name of the variety.
- 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.

We are deeply concerned by including selective obligatory markings for some species, quality inspectors are being asked to validate species, varieties and/or their hybrids - something they are not trained or equipped to do. Within the U.S. inspection system, quality inspectors do not validate species, varieties and/or their hybrids; they only record such information as indicated on the package.