Economic Commission for Europe
Committee on Trade
Working Party on Agricultural Quality Standards
Specialized Section on Standardization of Dry and Dried Produce
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Item 3 (c) of the provisional agenda
Review of UNECE Recommendations

Revised Recommendation for Dried Grapes

Comments by the delegation of Germany

The following comments were submitted by the delegation of Germany (referring to document ECE/TRADE/C/WP.7/GE.2/2015/5):

Minimum requirements – sugar crystals:

Germany would prefer to replace the word “evident” by “visible to the naked eye”.

Moisture content:

- In case of Malaga Muscatel variety, the end of the phrase should read “treated with preservatives or preserved by other means”
- The limits specified for the moisture content preferred by Turkey are acceptable.

Quality tolerances:

- The first paragraph should be replaced by the paragraph of the Standard Layout “At all marketing stages, tolerances in respect of quality and size shall be allowed in each lot for produce not satisfying the minimum requirements of the class indicated.” There should be no reference to the sample size as this is going to be defined in the separate document on sampling.
- In all three tables, the term “undeveloped berries” should be replaced by “underdeveloped berries” as this is the term used in the minimum requirements.
- In all three tables, the lines “of which damage caused by pests” should be deleted.
- In all three tables, the tolerances for berries with capstem attached are indicated as “pieces by count in 100 g”, thus it is not possible to indicate
“percent” in the lines of the specific defects. The standard can define the tolerances by percentage or by pieces in 100 g but not both at the same time. Germany would prefer pieces per count.

**Table - seedless:** The tolerances for berries having seeds are indicated as “pieces by count in 100 g”, thus it is not possible to indicate “percent” in the lines of the specific defects. The standard can define the tolerances by percentage or by pieces in 100 g but not both at the same time. Germany would prefer pieces per count.

- The tolerances for sugared berries should be restricted to 5 – 12 – 15 % for the respective classes.

**Table – seedbearing:** The tolerances for sugared berries should be amended to 5 – 12 – 15 % for the respective classes.

**Table – currants:** The percentage for underdeveloped berries should read 0.5 – 1 – 2 % for the respective classes.

**Size tolerances – all three tables:** The sizing provisions say “Size is determined by …” They do not state that there is no need for sizing or that sizing is optional. Thus, Germany understands that sizing is mandatory. Just the sizing method is optional. Therefore, the standard must grant tolerances – and with respect to the Standard Layout 10 % in the respective classes. Germany does not understand the remark of Turkey that tolerances for sizing are not applicable. If Turkey and other delegations vote for an optional sizing then tolerances for sizing are necessary in case a size is indicated. This must be clarified.

**Tolerances for extraneous vegetable material – all three tables:** This term should be amended by adding “excluding pieces of stems”. The tolerances for pieces of stems should follow directly after the tolerances for extraneous vegetable material.

**Tolerances – General remarks:**

- In all three tables on tolerances a total tolerance is missing. Germany is proposing to introduce 5 – 12 – 15 % for seedless and seedbearing dried grapes and 5 – 10 – 15 % for currants.

- Once the tables on tolerances have been revised and agreed, it should be checked whether the tables on seedless and on seedbearing dried grapes could be merged.

**Uniformity – 1st paragraph:**

Provided sizing would be optional, then after “size” the term “if indicated” must be inserted. The words “or commercial type” must be deleted. There is no optional indication of the commercial type. As the uniformity and indication of the commercial type is mandatory, before the word “variety” the words “commercial type,” must be inserted.

The term “except mixed packages” must be deleted. For trade, the uniformity by crop year is indispensable.
- Would Turkey like to allow packages containing the crop or different crop years? If yes, the conditions for this option must be clearly specified.
- What does “top-layered muscatels” mean?

**Marking – nature of produce:**

- Germany is for simple and clear indication of the type of produce – any duplication or deception must be avoided.
- Germany agrees that the common name of the produce is “dried grapes” or “raisins” as specified in the first indent.
- Germany agrees that the name of the variety may be given on an optional basis – but Germany would like to see these provisions to appear as last indent in section VI.B.
- When defining the rules for the indication of the commercial type, it must be taken into account that on each carton the indication “dried grapes” or “raisins” is a mandatory indication. A repetition of this term must be avoided. Thus, Germany proposes that the provisions concerning the indication of the commercial type must be re-worded and is annexed to the provision for the common name. In detail this section should read:

  - “dried grapes” or “raisins” followed by the commercial type:
    - “Seedless” which may be replaced by “Sultana” or “Thompson Seedless”
    - “Seed bearing”
    - “Currants”
  - Name of the variety (optional).

As last indent, the following should be added: “with capstems” (when appropriate).

**Marking – size:**

Section III does not provide much information that may be used for indication. Germany proposes to specify size indications as follows:

Size expressed as
- minimum size in mm followed by “and over” or “and plus”,
- maximum size in mm followed by “and below” or “and less”, or
- number per 100 g.