The United States of America is pleased to submit the following comments to the UNECE FFV Citrus Working group on proposed changes to the “Marking Provisions” in the UNECE Standard for Citrus Fruits (UNECE FFV-14).

**Issue 1:** The Listing of common name of the species if the fruit is not visible from outside, but

obligatory for satsumas and clementines.

The United States reiterates its opposition to the specific labeling for Satsuma’s and Clementines. Such special labeling requirements in the standard create and/or provide economic advantages to Satsuma’s and Clementines producers and traders that are not afforded to other citrus varieties and corresponding industry. We believe that quality standards should not favor or afford special status to any specie, variety, producer or trader in the market place; therefore, the United States recommends the following changes:

B. Nature of produce

• Common name of the species if the produce is not visible from the outside~~, but~~

~~obligatory for satsumas and clementines~~

• “Mixture of citrus fruit” or equivalent denomination and common names of the

different species, in case of a mixture of citrus fruit of distinctly different species

• Name of the variety for oranges, all hybrids of the mandarin group and mandarins

~~other than satsumas and clementines, for which the indication is optional~~

• “With seeds” for clementines with more than 10 seeds per fruit

• “Seedless” (optional)

• For grapefruit and hybrids: the indication “pink” or “red” where appropriate

• For pummelos and hybrids: the indication “pink” or “red” where appropriate.

The U.S. is also very concerned that the inclusion of such selective obligatory marketing provisions, quality inspectors are being asked to validate species, varieties and/or their hybrids - something they are not trained or equipped to do and does not have a role in quality conformity process. Quality inspectors should not validate species, varieties and/or their hybrids; they should only record such information as indicated on the package. Additionally, it very ironic that concerns about “misleading the consumers” in the citrus standard are only expressed in regards to Clementines and Satsumas, but not to other citrus varieties covered by the standard.

**Issue 2:** Genetic Lineage/Parentage

The U.S. is strongly opposed to the use of genetic lineage/parentage as a basis for verifying labeling/marking or identifying citrus varieties at the quality inspection stage for these reasons:

* No other UNECE or CODEX Alimentarius FFV standard has such requirement.
* Progeny of the same parents can exhibit very different traits due to different production practices and geo-climatic factors; hence marking a parentage will be very confusing to the trade and more so to inspectors.
* Using parentage as part of the marking requirements will be very disruptive and result in chaos in the citrus trade and will potentially spread to other sections of the FFV trade. We believe that if importing countries are not satisfied for whatever reason with information indicated on the package and suspect fraud, they should bilaterally address this concern to the relevant trading party, product origin.
* In the U.S there are some very complex new citrus hybrids such as the following four thata would pose challenges in trade if the parentage requirement is required as part of the Marking Provisions:

* The Fallglo Tangerine: this variety is ⅝Tangerine, ¼ Orange and ⅛ grapefruit. The fruit is very much a tangerine (mandarin) in characteristics and will be marketed as such.
* The Murcott (Honey Tangerine): it is actually a Tangor (Tangerine x Orange) – but called a tangerine because it has the characteristics of a Tangerine and consumers accept it, and is marketed as such.
* Grapefruit hybrids with mixed parentage: Their flavor and profile are those of grapefruits; consumers accept them as grapefruit and are marketed as such.
* Orange hybrids whose parentage is not pure orange: – These have the characteristics and flavor profile of an orange and are accepted by consumers as an orange; therefore are marketed as orange.

The United States believes a decision by the UNECE Specialized Section on Standardization of Fresh fruits and Vegetables that favors using parentage as a mandatory part of the “Marking Provisions” in any of its FFV standards is disadvantageous to innovation of new varieties and poses unnecessary burdens on the quality inspection bodies/agencies in the marketplace. Finally, a review of the very diverse views expressed by the experts during this issue’s discussion at the 62nd session of the UNECE Specialized Section on Standardization of Fresh Fruits and Vegetables (April 28 – May 1, 2014) foretell of the chaos and trade disruptions that such a requirement will have on the fresh citrus fruits but on the entire fresh fruit and vegetable trade. Therefore the U.S does not support this proposed requirement.