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TELEFAX TO MR. [REDACTED]

DGVI

FROM [REDACTED]

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With compliments

EUROPEAN COMMUNITY BANANA TRADE ASSOCIATION**E.C.B.T.A.**

A l'attention de Mr. [REDACTED], Directeur
DGV
Commission des Communautés Européennes
200 Rue de la Loi
1049 Bruxelles

Le 8 mars 1994

Cher Monsieur [REDACTED],

ECBTA a travaillé ces dernières semaines sur les normes de qualité "bananes". Nous avons déjà eu l'occasion de vous transmettre quelques remarques préliminaires dans nos précédents courriers.

Par la présente, nous souhaitons vous soumettre les commentaires du commerce sur deux documents de travail de la Commission en matière de normes de qualité, documents portant références Banan/Trav94/03 et Banan/Trav94/03Rev1.

Nous nous permettons également de vous transmettre une proposition de normes de qualité élaborée par le commerce et nous espérons vivement que la Commission tiendra compte de notre projet. Nous attirons votre attention sur le fait que certaines variantes ont été proposées par certains de nos membres, qui souhaiteraient voir le nombre de classes limité à deux au lieu de trois. Par ailleurs, la proposition de prendre le doigt plutôt que la main ("hand") ou le bouquet ("cluster") comme base d'appréciation est considérée comme un inconvénient par ces mêmes membres.

Le commerce espère avoir l'occasion d'être consulté sur les normes de qualité par la Commission avant l'adoption de toute proposition.

En vous remerciant anticipativement de l'attention que vous porterez à ces divers documents, nous vous prions d'agréer, cher Monsieur [REDACTED], l'expression de nos sincères salutations,


[REDACTED]
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DELEGUE GENERAL

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EUROPEAN COMMUNITY BANANA TRADE ASSOCIATION

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COMMENTS OF THE TRADE ON THE EC WORKING DOCUMENT LAYING DOWN QUALITY STANDARDS FOR BANANAS (Banan/TRA V94/03)

I. We request to delete the Annex and to add after "varieties" : cultivars of the genus Musa (AAA groups). (According to renowned scientists as R.H. Stover and Ph. Rowe, this would be the correct definition and covers all edible marketed varieties.) Further add in the last line after "industriel" : and so-called exotic bananas such as apple bananas, lady fingers, etc.

II. It seems to be unrealistic to apply norms to both, green and yellow bananas, since the requirements on and characteristics of green and yellow bananas are not compatible.

Given the potentially highly progressive quality decline of produce from the packing station to the retail shelf, more pronounced for bananas than for other products, it is not practicable to apply the same quality standard to both green EC bananas in their place of origin and all other bananas in their ripe state. Therefore, quality standards should apply to green bananas at the port of discharge/import into the EC.

III. Minimum requirements, item 8 : add "practically".

A. Delete last two paragraphs from "le développement" until "selon la variété".

B. Classification into two classes is acceptable.

i. Request to alter defective area to 2 cm² instead of 1 cm².

ii. Request to alter defective area to 4 cm² instead of 2 cm².

IV. The proposed sizing obviously refers to EC bananas. We would suggest to alter for the first category the minimum diameter from 30 mm to 27 mm. Further, we suggest to include the methodology exposed in the enclosed proposal of the trade for quality standards.

VI. First paragraph: Delete "variétés et/ou ... commercial".

Delete second paragraph totally.

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COMMENTS OF THE TRADE ON THE EC WORKING DOCUMENT LAYING DOWN QUALITY STANDARDS FOR BANANAS (BANAN/TRAV 94/03 REV 1)

I.a. There is little practical benefit to listing varieties. The most common varieties in the "Annexe" are indistinguishable once they are packed, and in practice it is common (and quite acceptable to the end-user) to find several varieties on the same farm and packed together.

Please refer to the "trade proposal".

I.b. This section should be revised to coincide with the "trade proposal". The quality standards should apply to green bananas at the port of discharge/import into the EC.

Given the potentially highly progressive quality decline from packing station to the retail shelf, more pronounced in the case of bananas than with other fruit products, it is not reasonable to apply the same quality standard to both green EC bananas in the place of origin and all other bananas in the ripe state, as proposed.

II.A. This section sets standards which in some cases have little to do with the requirements of the trade or the consumer. The "trade proposal" has omitted such items, and has been confined to those product features which significantly interfere with the marketability or consumer acceptance of the product.

Specifically:

Damage due to low temperatures needs to be modified by the word "practically", since such "chill damage" or "underpeel discoloration" frequently occurs at trace or light levels without significant commercial consequences. At more severe levels it is of course highly detrimental to the quality of bananas.

The paragraphs referring to the condition of the crown and the peduncle should be omitted. Why set such detailed standards for the non-edible part of the banana? The last sentence of page 1 ("saines ; ...") sets a sufficient standard in crystal clear language.

The last paragraph, concerned with the state of maturity, can be omitted in regulations explicitly referring to green bananas.

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II.B. In this section, clarity of meaning is of the utmost importance. Also, the standards for blemishes need to be based on the evaluation of samples from various origins.

The standards as proposed by the Commission are not tenable, for the following reasons:

- * The wording is not sufficiently clear in defining the practical application of the standards for defective area.
- * The standards set for defective area are unreasonable severe, for both green and ripe bananas at any point from discharge onwards.
- * The combined effect of paragraphs I.b and II.B. is likely to be that only EC bananas (evaluated green after packing) will qualify for Categories Extra or I. for all other bananas (evaluated ripe), it will be difficult even to meet the standard set for Cat. II.

The "trade proposal" is based on an assessment of the standards first proposed by the Commission. These were found to be too stringent for any green bananas at discharge. Furthermore, the wording of the "trade proposal" is more precise ("the total defective area on any finger ...").

III. This latest proposal suggests finger length measurement along the concave curvature of the bananas, on the inner whorl. For practical reasons, this is not to be recommended. With few exceptions, world-wide practice for finger-length determination consists of measurement of the fingers on the outer whorl, since this is the only method which can be used on the stem or bunch.

The "trade proposal" incorporates the outer whorl method, and additionally specifies the so-called "reference finger" which is to be measured for both length and diameter. It also contemplates a wide range of sizes, which could possibly (if required) be expanded to include an "Extra Small" classification, for bananas with a minimum diameter and length below the standard set for the "Small" size.

The Commission's latest proposal suggests that the range of finger length within a package be limited to 6 gm. This should not be regulated, but should be allowed to respond dynamically to the requirements of the trade and the consumer.

IV. The tolerance for "Extra" category, proposed at 5%, is too restricted. Recommended tolerance: 10% (as in "trade proposal"). This recommendation is based on statistical studies of green and ripe bananas.

V.A. The second sentence ("La partie apparente...") should be omitted. In order to minimise injury to the product, smaller bananas are usually packed in the lower part of the package.

V.B. The word "new" in the second sentence is best omitted, given the trend towards recycled and reusable materials.

V.C. This paragraph should be omitted in its entirety.

The presentation of bananas as single fingers, clusters, or hands (or a combination of the above), should be determined by the requirements of the trade, the retail sector, and the consumer. These requirements are likely to vary by market and over time.

The whole and healthy condition of the product is addressed in Section II, and references to this effect in V.C. are redundant.

EUROPEAN COMMUNITY BANANA TRADE ASSOCIATION

E.C.B.T.A.

Brussels, March 01, 1994

PROPOSAL OF THE TRADE : QUALITY STANDARDS FOR BANANAS

I. DEFINITION OF PROCEDURE

This standard applies to bananas grown from commercial cultivars of the genus *Musa* (AAA groups) to be supplied fresh to the consumer, after preparation and packaging. Plantain bananas and bananas for industrial processing, and "exotic" bananas like ladyfingers, apple bananas are excluded.

II. PROVISIONS CONCERNING QUALITY

The purpose of the standard is to define the quality requirements for green bananas at the port of discharge.

A. Minimum requirements

In all classes, subject to the special provisions for each class and the tolerances allowed, the bananas must be :

- intact
- firm
- sound; produce affected by rotting or deterioration such as to make it unfit for consumption is excluded
- green
- clean; practically free from any visible foreign matter
- practically free from pests
- practically free from damage caused by pests
- practically free from bruises affecting the pulp
- practically free from damage caused by low temperatures
- free from any foreign smell and/or taste

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B. Classification

Bananas are classified into three classes defined below :

(i) "Extra" class

Bananas in this class must be of superior quality. They must be characteristic of the variety and/or commercial type.

The fingers must be free from defects with the exception of very slight superficial defects, the total defective area on any finger not exceeding 2 cm², provided that these defects do not affect the general appearance of the produce, the quality, the keeping quality and presentation in the package.

(ii) Class I

Bananas in this class must be of good quality. They must be characteristic of the variety and/or commercial type.

The following slight defects of the finger however, may be allowed provided that they do not affect the general appearance of the product, the quality and presentation in the package :

- slight defect in shape,
- slight skin defects, the total defective area on any finger not exceeding 4 cm².

(iii) Class II

This class includes bananas which do not qualify for inclusion in the higher classes, but satisfy the minimum requirements specified above.

II. PROVISIONS CONCERNING SIZING

Size is determined by the length and the diameter of a finger.

The size is determined by the diameter (or "grade") of the fruit's middle part and the length of the convex part. The length of a finger is measured along the outside curve from the blossom end to the base of the peduncle (where the edible pulp ends).

The finger used for determination of length and grade (the reference finger) of clusters, is the outer whorl finger immediately adjacent to the cut made to divide the hand into clusters.

The finger used for determination of length and grade (the reference finger) of hands, is the finger at the centre of the outer whorl.

For all categories of bananas, the minimum length must be 14cm (5,5"), and the minimum diameter must be 27 mm (35/32").

IV. PROVISIONS CONCERNING TOLERANCES

Tolerances in respect of quality and size shall be allowed in each package for produce not satisfying the requirements of the class indicated.

A. Quality tolerances

- (i) "Extra" class
10% by number or weight of bananas not satisfying the requirements of the class, but meeting those of Class I.
- (ii) Class I
10% by number or weight of bananas not satisfying the requirements of the class, but meeting those of Class II.

B. Size tolerances

For all classes, 10% by number or weight of bananas deviating from the minimum size.

V. PROVISIONS CONCERNING PRESENTATION

A. Uniformity

The contents of each package must be uniform in appearance and contain only bananas of the same origin, quality and size.

B. Packaging

Bananas must be packed in such a way so as to protect the produce properly.

The material used inside the package must be clean and of a quality such as to avoid causing any external or internal damage to the produce. The use of materials, particularly of paper or stamps bearing trade specifications, is allowed provided the printing or labelling has been done with a non-toxic ink or glue.

Packages must be free of all foreign matter.

VI. PROVISIONS CONCERNING MARKING

Each package must bear the following particulars, in letters grouped on the same slide, legibly and indelibly marked, and visible from the outside :

A. Identification

Packer and/or dispatches	Name and address or officially issued or accepted code mark
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B. Nature of produce

- "Bananas" if the contents are not visible from the outside

C. origin of produce

- Country of origin and optionally, district where grown or national, regional or local place name.

D. Commercial specifications

- Class and size,
- Net weight (optional).