

E

**EASTERN CARIBBEAN STATES MISSION
TO THE EUROPEAN UNION**

Tel. [REDACTED]

Fax [REDACTED]

DGVI AGRICULTURE

26737 25 MAI 94 08 38

ORIGINAL ~~E~~

COPIE

[REDACTED]
1040 Brussels

Brussels,

18 May 1994

Mr. [REDACTED]
Division Head
DGVI - Agriculture
Commission Services
Rue de la Loi 170
1048 BRUSSELS

I have the honour to attach herewith, on behalf of the ACP traditional suppliers of bananas, some comments on the Commission's proposal for quality standards applicable to bananas imported into the European Union. The comments are submitted with the expectation that they will be taken into account in the forthcoming deliberations of the COREPER and of the EU Council.

The ACP traditional suppliers of bananas therefore, solicit your good offices in this regard and hold themselves ready to consult with the Commission on this matter at a mutually convenient date.

Yours faithfully,

th [REDACTED]
Ambassador for the OECS
Chairman, ACP Working Group on Bananas

cc: Mr. [REDACTED]
Division Head
DG VIII - Development
Commission Services
Rue de Geneve 12
1030 BRUSSELS

Brussels, 13 May 1994

**Comments by ACP suppliers of bananas on the draft
Commission Regulation laying down quality
standards for bananas (VI/3140/94)**

The ACP traditional suppliers of bananas to the European Union welcome the opportunity to comment on the Commission's proposal for quality standards applicable to bananas imported into the EU. While the proposal in general, poses few problems for the ACP, where these problems arise, they are of a sufficiently serious nature to warrant the following comments which the Commission is requested to take on board when the definitive text is being finalised.

I (a) Definition of Produce

The word "green" should be inserted before "bananas" in line one.

I (b) Scope

In view of the fact that a marked quality loss occurs after packaging during transportation to the market, the ACP suggest that determination of banana quality should be set at the port of unloading for all bananas entering the E.U. Determination of quality at the packing shed before sea transportation will create a false impression of high quality, misleading for both the trade and the consumer.

II. Provisions Concerning Quality

A. Minimum requirements

The ACP are of the view that those requirements are on the whole too rigid.

(i) More specifically, with reference to "latex runs" in paragraph 1 which are commonly observed in varying degrees on bananas from all sources; the wording should be removed as being unreasonable especially since "slight traces of latex" are explicitly permitted for Class I bananas in the very same draft Regulation.

(ii) The requirements for the stalk should refer to "creasing" instead of "bending".

(iii) The entire section in paragraph 2 concerned with the "condition" of the "cushion" (better translated as "crown" for the English text) should be omitted since the criteria specified are neither sufficiently precise nor commercially important for inclusion in minimum standards. Indeed a realistic standard should make some allowance for crown rot instead of the stipulations under paragraph 1 "without fungal damage" and under paragraph 2 "free from fungal contamination".

(iv) Para 3 should refer to the "maturity" instead of the "development" of bananas; and in the third line of the indent the phrase "degree of maturity" should be amended to read "condition of ripeness". The original text is ambiguous.

B. Classification

(i) 'Extra' Class

These criteria are very restrictive and should be deleted. They are unrealistic since no banana product from whatever source is capable of meeting this standard. Furthermore "characteristic typical of the variety" is not an adequate entry for defining a standard.

(ii) Class I

The ACP wish to have the minimum area allowed for slight skin defects and superficial blemishing raised to 2cm instead of 1cm in paragraph 2, second indent.

(iii) Class II

Similarly, second indent in paragraph 2 should be amended to read 4cm instead of 2cm.

IV Provisions concerning tolerances

A. Quality tolerances

(i) 'Extra' Class

While maintaining their views on the "Extra Class" category, the ACP wish nevertheless to point out that the stipulation ie "5% by number" of bananas is not clear and in any case should preferably refer to "5% by clusters".

(ii) Class I and (iii) Class II: similar comments are made in reference to "10% by number" which should be ammended to read "10% by clusters".

B. Size tolerance

The size fixed in the draft regulation (6cm) is too restrictive for ACP realities. Should be amended to read (9cm).

C. Production

Para 1 seems to be inconsistent with the reference to "hands and clusters (parts of hands)" under section A - Minimum requirements which suggests that the product could be presented in either "hands" or "clusters". The stipulation that "the bananas must be presented in clusters" will prove problematic for some ACP exporting States.

Notwithstanding the above, the ACP are generally of the view that all references to the number of "clusters" and "fingers" are best removed completely since they are ambiguous. The number of fingers per cluster and the number of missing fingers are best left to the commercial specifications agreed to between the suppliers and the trade operators. It should be noted that higher quality bananas frequently have a higher number of missing fingers than lower qualities, where less product selection is exercised. As to the number of fingers per cluster, this is governed by the value of the product and consumer preference, neither of which is constant.

D. Commercial Specifications

The third indent relating to size should be scrapped as entirely irrelevant and liable to lead to arbitrary decisions at point of inspection.