

## **Draft legislation of the Federal Ministry of Food and Agriculture Ordinance reorganising provisions of food law on food additives**

### **AGRUPOST Comments**

Our main comment or suggestion is referred to **§ 5 Labelling** where is stated the following text:

7. *in the case of fresh fruit and vegetables with food additives with numbers E 445, E 471, E 473, E 474, E 901 to E 905, and E 914 used for surface treatment, the indication ‘waxed’.*

**From our point, the term “waxed” should be changed to the term “coated”.**

Waxing is particular way, and not the only one, to deliver or to build a coating on a surface; the term “coating” is describing better and in a more general way any external treatment given to the fresh fruit and vegetables.

Additionally, among the E numbers included “E 445, E 471, E 473, E 474, E 901 to E 905, and E 914”, only some of them have included on their definition the term wax; so, we understand that the term “coated” would cover better all the E numbers targeted.

Last but not least, the term “coated” may be understood much more easily by the consumers than the term “waxed”.

Technical benefits of fresh fruit coating have been scientifically demonstrated and established during last decades and it is fully accepted that they deliver very relevant and positive additional functionalities than can be summarised as follows:

- i. reducing permeability to water loss
- ii. creation of a modified atmosphere for coated fresh produce and effect on ripening
- iii. retardation of weight loss and surface desiccation
- iv. maintaining original structural integrity
- v. replacing/recovering of the surface natural coating lost during cleaning and sanitation after harvest.
- vi. reducing decay

Coatings in general are primarily applied to fresh fruits to increase their postharvest life by regulating the exchange of water and gases (oxygen and carbon dioxide). This primary function allows for less weight loss during storage and, in some cases, the alleviation of some postharvest physiological disorders such as chilling injury or rind breakdown. In addition, coatings can also provide shine and gloss to improve the fruit’s external appearance.

# AGRUPOST

## ***Agrupación Española de Servicios y Procesos Postcosecha***

Avda. Cortes Valencianas, 39 – Planta 1

46015 – VALENCIA (SPAIN)

---

All those benefits of post-harvest coatings lead to increase shelf-life of the fresh fruits and contribute to reduce food losses along the food supply chain, being this contribution perfectly aligned with the aim of the FAO and UNECE initiatives for reducing food losses and waste (UNECE. Code of Good Practice - Reducing food loss in handling fruit and vegetables. 2019).