



March 8, 2011

Dr. Michael Flueh
Head of Unit E-3
DG SANCO
Brussels Belgium

Dear Dr. Flueh:

Allow me to introduce ourselves before turning to the main purpose of my letter. We at Decco have been serving the produce packing industry worldwide for the last 75 years with our food grade postharvest products.

I do not want to bore you with unnecessary explanations since I am sure that you are well aware of current events and developments involving morpholine in fruit coatings. After the initial shock and hectic that this issue caused in EU, our customers started using EU approved coatings, which we have been offering since mid 90's, but not popular because of their gloss lower and the general perception that USFDA approved food additives were legal in the EU. Anyway the packers started using EU approved coatings immediately as soon as the morpholine issue was addressed in the UK. After EU officially imposed grace periods for importing morpholine treated fruit expired in December 31, 2010, most of the fruit exporters in the US and the rest of the world had changed to EU approved products and morpholine free coatings.

The swift reaction of DG SANCO and EFSA to manage this problem put some order back into the chaos, but the decision of leaving the morpholine contamination levels to "Detection Limits" of the analytical laboratories created a big regulatory hole and gave some unprofessional and opportunistic labs a free ride to decrease their so called "LOD and LOQ" for bashing their competition and to exploit the situation for boosting their revenues. These practices caused unnecessary rejection of fruit loads entering EU and escalated fruit prices to new highs denying the access of affordable fresh fruit to consumers.

Having said that, I would like to ask you that DG SANCO reconsider their decision and to put an end to this anarchy by establishing a realistic maximum contamination level for morpholine (preferably <0.3ppm on fruit) and an official analytical method, which will free all involved parties from this "lawlessness".

I do not want to conclude my letter to you without bringing up another concern of mine involving the use of microcrystalline, carnauba and shellac as glazing agents for some commodities and not the others. These limitations do not serve any purpose but confusion. As a matter of fact some of these glazing agents are not appropriate for one or



more of the commodities listed under them at all, e.g. shellac commercially cannot be used on pineapples its film crack on pineapple and polyethylene does not deliver the desired weight loss control unlike microcrystalline wax that produces a steady and nice protective film with good weight loss control.

These limitations do not make any scientific sense and DG SANCO will serve the community more by following Codex and eliminate the restrictions, at least for fruits, which are peeled for consumption e.g.

- Microcrystalline wax for pineapple and even citrus
- Shellac for mangoes, papaya and avocados
- Carnauba for mangoes, papaya and avocados

Thank you for your attention in this matter and in anticipation of a prompt reply and action.

Sincerely,

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