

MS comments Template

QF003 Reference #: CQ/2025/0219	Document: DCRS 82: 202x – Cocoa Bean Quality – Sampling Requirements
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1	2	(3)	4	5	(6)	(7)
MB¹	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of comment²	Comment (justification for change) by the MB	Proposed change by the MB	RTC observations on each comment submitted
SKN	Scope (Clause 1)		te	The standard focuses on producers/exporters. St. Kitts and Nevis, as a non-producing trader, requires clarity on applicability to importers.	Add: This standard also applies to importers and traders of cocoa beans within CARICOM, ensuring alignment with regional trade practices.	Partially accepted – The phrase ' to traders of cocoa beans' was added to the last sentence. Change made to Scope: It also provides guidance <u>to traders of cocoa beans</u> , on the appropriate sampling tools and outlines the procedures to be followed during the sampling process.
SKN	3.16 (Shipping Mark)		te	Requires physical marks on packages, which may conflict with repackaging during trade.	Clarify exemptions for repackaged lots under controlled conditions, with updated documentation.	Not accepted – Repackaging during trade is outside the scope of this standard. The standard deals with sampling from containers that make up the lot according to the appropriate sampling frequency. No change was made.

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LC	Clause 3.18	N/A	Te	<p>To ensures traceability in audits, can we consider referencing in a Note the Test Sample criterion in DCRS 83 – Annex A.</p> <p>Also, for alignment between the standards, add the Noted from DCRS 83.</p>	<p>Consider updating for term: Note “test sample” is derived from a reference sample not exceeding 500g – DCR 83 Annex A (normative) and DCRS Clause 5.13 (please find a means of alignment)</p> <p>Consider adding the Note from DCRS 83 Terms and Definition 3.25:</p> <p>Note 1 to entry: The test sample shall be obtained after sieving and removing the cocoa related matter, flat beans and foreign matter.</p>	<p>Partially accepted</p> <p>Both DCRS 83 Annex A and DCRS 82 5.1.3. have been harmonised with the same text.</p> <p>The RTSC agreed to change 5.1.3 to 'For each primary sample extracted, the size shall be a minimum of 500 g beans per container'.</p> <p>To ensure alignment with this standard, the note was removed from DCRS 83</p>

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SKN	3.20 (Warehouse Warrant Definition)		ed	The definition assumes ownership by producers. Traders may require clarification on documentation for transshipment.	Revise definition to include: "...ownership or legal custody of products stored, including transshipment entities."	Partially accepted – Agreed to include legal custody and transshipment. Definition was reworded. The definition was changed to include the phrase ' or legal custody of a specific quantity of cocoa beans, including transshipment entities'. Change made to 3.20: Warehouse warrant Warrant - documents stating the ownership or legal custody of a specific quantity of cocoa beans, including transshipment entities, with specific characteristics stored in a specific warehouse for a specific fee.

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LC	Clause 4.2.3/ 1	1	Te	<p>For auditing purposes, the term “clean surface” is vague. Please consider enhancing food safety compliance and reduces ambiguity for field assessors.</p> <p>What is this “clean surface” to look like? Clause 4.2.4 clarifies that suitable diving apparatus are of “food-safe material” – maybe a similar approach.</p>	<p>Consider:</p> <p>4.2.3 A clean surface (e.g., stainless steel or food-grade plastic tarp) shall be used, on which to pour out the composite bean sample for mixing, coning and quartering.</p> <p>Or</p> <p>A clean, food-safe surface shall be used, on which to pour out the composite bean sample for mixing, coning and quartering.</p>	<p>Partially accepted</p> <p>Change made to 4.2.3 - A <u>food-safe surface free from physical, chemical and microbial contamination</u> shall be used, on which to pour out the composite bean sample for mixing, coning and quartering</p> <p>Note: Food-safe surfaces may include stainless steel or food-grade plastic tarp.</p>

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SKN	5.1.1 (Sampler Qualifications)		ge	Non-producing states may lack certified samplers.	Add: "CROSQ shall facilitate regional training programs for samplers in member states without cocoa production."	<p>Partially accepted – The RTSC acknowledges that certified or qualified samplers may be difficult to achieve as currently there are no formal certification programmes for cocoa bean samplers. Based on this, the definition for samplers was changed to reflect that persons can be trained to be a sampler, which would provide them with the ability, knowledge or skill to do the task. The standard can be used as a guide for training. The word 'qualified' was changed to 'competent'.</p> <p>Change made to 3.14: Sampler: person <u>competent</u> and authorized to collect samples'</p> <p>Training programs facilitated by CROSQ is outside the Scope of this RTSC.</p>

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TT	5.1.1		te	Sampler competency - Sampling to be performed by qualified personnel; define national competency standard, curriculum, and recertification interval.	Add national annex / guidance note.	Partially accepted - The RTSC acknowledges that certified or qualified samplers may be difficult to achieve as currently there are no formal certification programmes for cocoa bean samplers. The standard can be used as a guide to develop national competencies in this area. The definition for sampler was changed in 3.14 from 'qualified' to 'trained'. No additional change was made.
TT	5.1.3		te	Minimum primary sample (500 g) - Mass may be excessive for research plots & small microlots; risk of depleting small batches.	Permit reduced minimum under controlled derogation (lab, research, microlot).	Not accepted – The test method outlined in this standard, requires a minimum of 500 g. Therefore the minimum sample was set based on the test method. No change was made.
TT	5.1.3		te	For consistency, change 'shall not be less than 500 g' to 'shall be a minimum of 500 g beans per container' as stated in 5.2.1 under paragraph c).	Change 'shall not be less than 500 g' to 'shall be a minimum of 500 g beans per container'	Accepted. Change made to 5.1.3

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LC	5.1.4	1	Te	The Clause state handling for “sound beans” but the requirement lacks directive on handling damaged beans.	Consider placing a Clause: Damaged or infested beans shall be documented, isolated, and recorded in the sampling report (see Annex F), giving the justification for exclusion.	Partially accepted The RTSC agreed to include segregated, stored and recorded to 5.1.5. Justification for the exclusion is based on the bean not being sound, therefore no additional justification is necessary. Change made: 5.1.5 Where a lot contains cocoa beans that are not sound, they shall be segregated from the sound beans, stored and recorded pending a decision on how the damaged beans are handled. NOTE 1: Not sound beans include beans damaged during handling, transport, or storage, regardless of its intrinsic quality. NOTE 2: Not sound beans can be recorded using the sampling report in Annex F under the Remarks section on the form. Add note to 5.1.4 NOTE: See 3.17 for definition of sound.
TT	5.1.8 Figure 1		te	Primary or Incremental sample (each at ≤ 500 g). Should it be ≤ or ≥ ?		Change to ≥ 500 g Change made in 5.1.8 Figure 1 and 6.2 c).

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SKN	5.2 (Sampling Frequency)		te	Sampling every container for ≤1,000 kg lots may increase costs for small traders.	Allow proportional sampling adjustments for lots ≤1,000 kg, subject to mutual buyer-seller agreement.	Not accepted – Buyer and seller agreements are usually based on organization relationships and on a case by case situation. For this standard, the requirement should be based on industry best practices. No change was made.
TT	5.2.1		te	Sampling frequency – Every container ≤1,000 kg; 1-in-3 to 12,500 kg; 1-in-5 to 25,000 kg may be costly for SMEs.	Allow risk-based reduction subject to historical compliance + regulator approval.	Not accepted – This requirement is non-negotiable as sampling frequency is based on industry best practices. No change was made.

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SKN	5.4.1 (Reference Samples Retention)		te	Retaining reference samples may pose logistical challenges for small traders lacking storage facilities.	Include guidelines for third-party storage options or simplified retention protocols for non-producing member states.	<p>Not accepted – The requirement is non-negotiable as the retaining reference sample is based on industry best practices and not following such can led to implications if reference samples are needed at a later date.</p> <p>No change was made.</p> <p>DCRS 82 Annex D 'Sample retention' addresses storage whether it is for the individual company or third party company. DCRS 83 Annex I 'Storage of cocoa beans' also addresses storage.</p>

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TT	5.4.2(c)		te	Reference sample hygiene – States 'in accordance with CRS 83'—provide explicit cross-reference to packaging hygiene clause to avoid ambiguity.	Replace text w/ 'in accordance with DCRS 83 Clause 8 (Packaging & Hygiene)' or replicate key requirements.	Partially accepted Clause 8 deals with the packing and marking of the containers. Reword c) Each reference sample shall have a minimum net mass of 2 kg and shall be packed and sealed in containers in accordance with the requirements of CRS 83 Clause 8, under hygienic conditions.
LC	5.4 Reference samples/ 5.4.2 d)	d) Line 2	Ed	Reference to “Clause 6.3” is incorrect, this has been omitted.	Ensures accurate cross-referencing within the document by correcting to “Clause 6”.	Accepted

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TT	5.4.2(d)		te	Label data fields – Excellent traceability dataset; ensure digital capture & alignment with national cocoa registry.	Mandate electronic template; integrate with barcode/QR tagging.	The RTSC does not have the authority to mandate any requirements. Not in the scope of the standard or this committee. As a regional standard, the minimum requirements were outlined. The standard can not be aligned with any one national cocoa registry. Include a note under 5.4.2 d) NOTE: This information may be displayed via an electronic code e.g. Bar code or QR code.
TT	6.2 c)		ed	Check font		Change was made.

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TT	Annex D		te	Sample retention/dispute – Critical for arbitration in export trade; need national retention period & custody rules.	Include table specifying retention duration (e.g., 12 months) & 3-way sample split.	Not accepted. The retention period is usually defined by a mutual agreement between buyer and seller. The split between samples are also done via a mutual agreement. No change was made.
LC	Annex D/ D.1.1	N/A	Te	The Annex is meant to be “informative”, however it does not state the recommended timeframe for retention.	Consider placing the timeframe for the sample retention period.	Not accepted. The retention period is usually defined by a mutual agreement between buyer and seller. No change was made.
SKN	Annex F (Sampling Report)		te	Mandatory fields like "farm name" or "primary producer" may not apply to imported cocoa.	Allow flexibility to omit non-applicable fields (e.g., "farm name") in the sampling report for traders.	Annex F is an informative annex therefore it is not mandatory.

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LC	Annex F/ Figure 1	N/A	Te	Clause 5.1.4 gives the conditions for the beans, but this is not reflected in the Sample Report Example, at the Standard application in assessment, this will be considered as a requirement for reporting.	Consider meeting the Standards requirement in the Annex F – Sample Report by including the following: - Bean Condition (sound/damage) - Weather at time of sampling - Container seal ID (for verification)	The sample report in Annex F is an informative Annex and its use is not mandatory. It can be updated or adjusted based on the users' needs. It is a flexible document.
TT	General		ed	Decide whether the term 'less than or equal to' or '≤' is used in both drafts.		It should be used clearly and consistently to ensure unambiguous technical specifications. Words used in the body of the standard, and symbols used in equations or graphical illustrations.

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