



INTERPRETING THE RECOMMENDED USAGE RESTRICTIONS FOR PLANT PROTECTION PRODUCTS ON SOUTHERN AFRICAN EXPORT CITRUS

Changes to the format of the *Recommended Usage Restrictions for Plant Protection Products on Southern African Export Citrus* (RUR) in September 2010 (and in subsequent RUR versions) have prompted an update of this explanatory guide to the RUR. It is hoped this guide brings about the correct understanding of the approach used in the RUR but users are welcome to contact CGA (Paul Hardman Tel: 031 765 2514) for

additional clarity should this guide not address your specific queries.

Layout of the Recommended Usage Restrictions Table

The table below replicates the Recommended Usage Restrictions table headings and uses two rows of information for active substances to illustrate typical cases. Another row has been added here (which does not appear in the RUR) to indicate the countries which subscribe to those restrictions. This row is shaded green. The countries are listed in the Notes on the last page of the RUR.

PRODUCT	All markets (including EU) except where other restrictions are specified	CODEX (A) ^a	CODEX (B) ^b	CANADA	US A	JAPAN	Other
Countries	<p>INCLUDING: EU Member States [Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom] Other [Iceland, Liechtenstein, Norway, Switzerland]</p>	<p>Africa [Angola, Benin, Botswana, Congo (Republic of), Gabon, Kenya, Madagascar, Mali, Mauritius*, Mauritania, Namibia, Senegal, Seychelles, Reunion*, Sudan*, Tanzania] Asia [China (Peoples Republic of), Hong Kong, India, Indonesia, Malaysia, Philippines, Singapore, Taiwan, Viet Nam]</p>	<p>Africa [Burkina Faso, Cameroon, Cote D'ivoire, Malawi, Nigeria, Tunisia, Uganda] Asia [Bangladesh, Sri Lanka] Middle East [Azerbaijan, Bahrain, Iran, Jordan*, Kuwait, Oman, Pakistan, Qatar, Saudi Arabia, , United Arab Emirates] Other [Russian Federation, Georgia*]</p>	Canada	USA	Japan	This column is used to describe specific requirements for markets other than those listed to the left.

PRODUCT	All markets (including EU) except where other restrictions are specified	CODEX (A) ^a	CODEX (B) ^b	CANADA	US A	JAPAN	Other
Active A/Product A	150d PHI as registered.	-	-	-	-	-	Korea: 150d PHI as registered for Soft Citrus and not later than 90% petal fall for other citrus.
Active B/ Product B	180d PHI	-	-	Not later than 90% petal fall	-	-	

Remarks:

- The blue shaded area is the default (or baseline) recommended usage restriction. The remaining columns only show restrictions where they differ from the default recommended usage restrictions.
- Where “ – “ is used this means no additional restrictions apply over and above the default recommended usage restrictions (blue shaded area). It does not mean that there are no restrictions for this market whatsoever.
- In some cases it is possible to have usage restrictions in the column to the right of the blue shaded area which are less restrictive than the default recommended usage restriction. This would typically occur when the country has a higher tolerance (MRL) than the General Export Tolerance. In all these cases the column restriction will never be more relaxed than what is published on the product label (which reflects the registered use of the product under Act 36 of 1947 in SA). The usefulness of having a less restrictive usage restriction is somewhat academic in the sense that few producers would be producing exclusively for a single market and almost always some proportion of the crop would be destined for the EU (where the default restrictions apply).

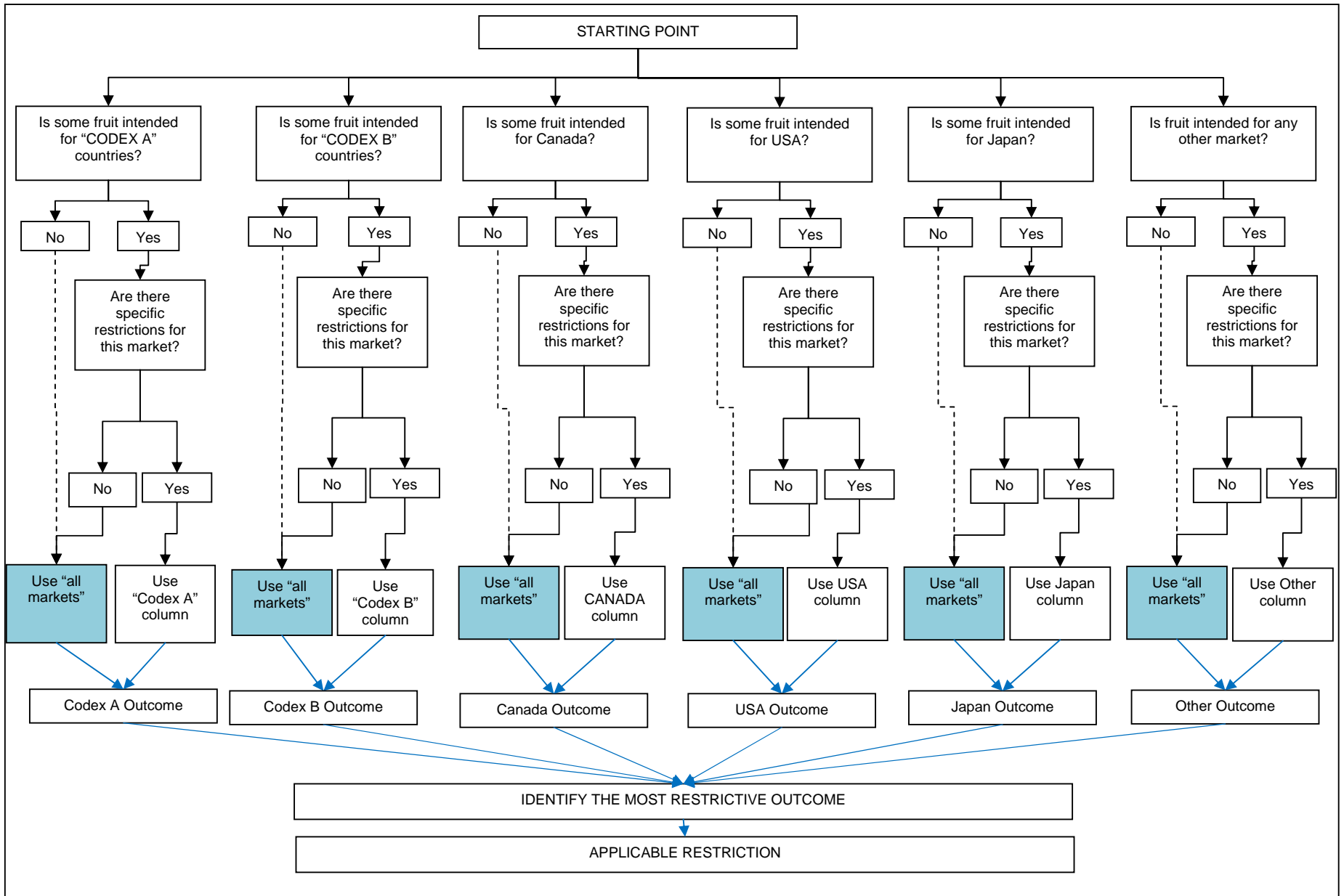
Deciding which usage restrictions are applicable:

This section explains the decision-making process for determining the most fitting usage restriction, i.e., how to establish which usage restriction to apply when fruit will be exported to a range of markets. This is a multi-step process starting with identifying where the fruit is likely to be exported to, followed by isolating the specific restrictions for each of those markets. Once all the specific restrictions per market are known, the third step establishes which market requirement is the most restrictive. If the most restrictive market requirement is used, it follows that the requirements in all selected markets will be complied with. To illustrate this decision-making process from Step 1 through 3 a decision chart has been included on the next page. This is then followed with two examples.

Step 1: From the “Starting point” follow each of the arrows to determine which markets will be targeted for exports (going from left to right – CODEX A to Other markets). The question is asked: “Is some fruit intended for *this* market?” If the answer is “yes” then proceed to determine if there are any specific requirements for that market. If “No’ (i.e. no fruit intended for this market) then the requirements for that market should obviously not influence the decision-making process further (in practice this means being bound by the requirements of the Default Usage Restriction).

Step 2: If fruit is likely to be exported to a particular market the question is asked: “Are there specific restrictions for this market?” If the answer is “Yes” then these restrictions need to be taken into account and carried forward as the decision “Outcome” for that market.

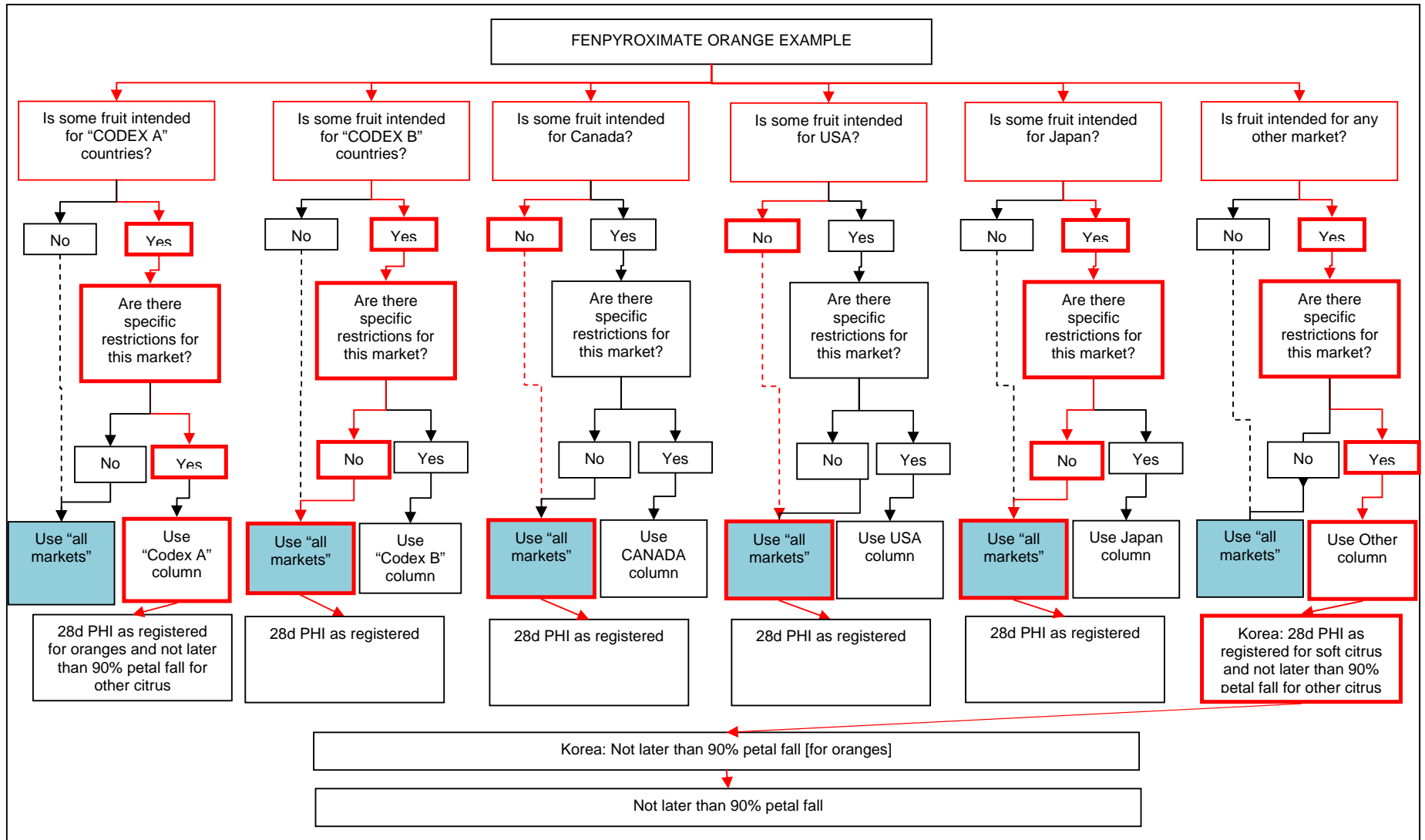
Step 3: This final step involves considering all the respective Outcomes per market and deciding which Outcome is the most restrictive. The most restrictive Outcome (i.e., longest PHI) is then the appropriate usage restriction to adopt to achieve compliance within all the markets fruit will be exported to.



Example 1: Fenpyroximate / Oranges

This example shows the decision-making process when considering which usage restriction is most applicable for

fenpyroximate on oranges. The markets being exported to are European Union, Hong Kong, Middle East, Japan and South Korea.



Example 2: Trichlorfon/ O ranges

This example shows the decision-making process when considering which usage restriction is most applicable for

Trichlorfon on SoftCitrus. The markets being targeted for this fruit are UK, Europe Union, USA, Hong Kong, Middle East and Russia.

