



FOOD SAFETY UPDATE

Japan Residue Testing Requirements

New residue testing requirements for fruit discharged into Tokyo port have become applicable. Although no official documentation has been sent through to CGA, various sources confirm that local (municipal) law requires that at the start of each season packhouses must conduct residue tests at one of the SA analytical facilities approved by the Japanese Ministry of Health, Labour and Welfare (MHLW). This appears to be a single residue test at the start of the season unless there are residue exceedances. Currently only the DAFF Stellenbosch laboratory is on the MHLW approved list, which is particularly problematic given the geographic distance between the northern (grapefruit) growing regions and the Western Cape. CGA and DAFF are currently applying to MHLW to have additional laboratories added to the list but this will take time. In the meantime, exporters encountering this problem are requested to engage with CGA so that the issues can be resolved on a case-by-case basis. It is sincerely hoped that this does not lead to significant disruption to the flow of fruit to Japan.

DDAC and BAC MRLs in the EU

The EU has relatively recently adopted MRLs for DDAC and BAC at 0.01mg/kg under directive EC/369/2005. Although these levels are effectively the same as those previously, by default applicable to citrus, there is in a sense additional responsibility to adhere to these MRLs now. Possibly due to the official MRL changes, CGA has also noticed an increase in the number of commercial and semi-commercial tests for Quaternary Ammonia Compounds (QAC) in Europe, particularly in Germany. This should be a signal to packhouse managers to adhere to the current recommended usage restrictions documents regarding the use of such products. Efforts are underway that will see the re-introduction of some QACs for citrus post-harvest use, but this will unlikely be concluded and come into effect before the end of 2012.

Indonesia Update

Notice has been given by the Indonesia authorities that the implementation of *Regulation of the Ministry of Agriculture No. 89/Permentan/OT.140/12/2011*, restricting the import of certain products of plant origin into Indonesia to four ports (Tanjung Perak Seaport, Surabaya; Belawan Seaport, Medan;

Soekarno-Hatta Seaport, Makassar; and Soekarno-Hatta International Airport, Jakarta and not including Jakarta seaport) has been postponed to 19 June 2012. This also seems to imply that the recent notification that all imports of plant origin must be preceded by a Prior Consent application (PSAT) has also been postponed. However, official confirmation of this has not been obtained. Therefore, exporters sending fruit to Indonesia are strongly urged to consult with their receivers about the PSAT prior consent requirements, which involve among other things going online and registering each consignment destined for Indonesia. Basic details about the process are available from CGA if required.

Separately, DAFF are initiating the process of re-applying for equivalence with Indonesia in line with Regulation No: 27/Permentan/PP.340/5/2009 again. If successful this will alleviate the administrative and cost burden of the current Indonesian Standard Operating Procedure for food safety checks being applied in SA for fruit exported to Indonesia. This is a diplomatic matter and a final outcome to this application is only likely to emerge in 2013.

Malaysia Labelling Requirements (3P)

After calls at the Citrus Marketing Forum on 15th March 2012 for CGA to coordinate the possible standardization of a label that would comply with the "3P" labelling requirements for product exported to Malaysia, CGA began a process of engagement with exporters to investigate the feasibility of this option. The feedback from exporters can be summarized as follows:

1. Although it is a good idea to have a standardized format, and that most exporters would probably adopt this format anyway, it would not be necessary to formalize this arrangement (i.e. get it included as a requirement under the APS Act 1990 under the Standards and Requirements for export citrus) due to additional administration and policing burden.
2. The example of the G10 label seemed an appropriate label that could, and probably would, be adopted by most exporters.
3. The issue of having to place the importer's details on the label was repeatedly raised as a concern. Unfortunately there appears to be no way around this, given it is part of the official requirements. Some exporters are thinking about getting their receivers to apply a stamp



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on the label on arrival in Malaysia. Confusingly the G10 label does not indicate who the importer is, and this label has been approved by Malaysian authorities, which may be further reasons to adopt the G10 label.

Unless there are additional calls for CGA to play a role in this matter it will be assumed that producers and exporters will be adhering to the 3P labelling specifications in a manner that meets the official requirements and is efficient for their own business processes.

Compiled by
Paul Hardman
CGA