

## SOPP (2-phenylphenol) EU MRL

When SOPP was re-classified as a plant protection product (previously considered a food additive) in the EU during April 2010 an MRL of 5.0 mg/kg was set for citrus. At that time a footnote was also added to the legislation EC/304/2010 indicating: "MRL valid until 30 September 2012 pending the submission and evaluation of two additional residue trials on citrus fruit and valid storage stability studies." During previous discussions with the EU Commission there was the expectation that the outstanding information would be submitted and that unless there was any major concerns with the data the MRL would remain at 5.0 mg/kg beyond 30<sup>th</sup> September 2012. This is still the prevailing view of the situation. However, the problem is that the Commission has not officially dealt with the matter of what the MRL will be after the 30<sup>th</sup> September 2012.

CGA recently engaged the Commission and other stakeholders and can provide the following feedback from these discussions:

- The Commission recognizes that they should have addressed this problem before the 30<sup>th</sup> September 2012 deadline kicks in and this has been an administrative oversight.
- The outstanding data mentioned in the footnote has apparently been submitted, but the completeness and appropriateness of that data to support the prevailing MRL is unknown, but is being given due attention.
- No proposals for a future MRL that would apply after September 2012 have been made. According to the Commission, in practical terms this means that if the MRL were to be changed, specifically lowered, then the Commission would need to initiate processes that can take several months (such as advising trading partners of their intentions to change the MRL and allowing for a phase in period). The fact that these processes have not been initiated thus far suggests the 5.0mg/kg MRL is likely to remain in place beyond September 2012.
- Unfortunately the MRL decision-making body, the Standing Committee on the Food Chain and Animal Health, will only meet again on the 4<sup>th</sup> October 2012. Only at that point can a formal notice be made regarding the status of the MRL.

- The Commission has discussed the situation with the Member States' Inspection Services in anticipation that a pragmatic approach is adopted for residue compliance monitoring over this period.

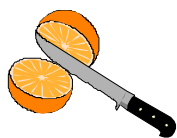
To summarize: The EU Commission was due to conclude the setting of the citrus SOPP MRL before the 30<sup>th</sup> September 2012. They have not done so and will only be able to do this on the 4<sup>th</sup> October 2012 at the earliest. This has created some uncertainty around the status of the MRL beyond 30<sup>th</sup> September 2012. Whereas CGA believe that the Commission and members states will adopt a pragmatic approach to this situation that will ultimately lead to undisrupted trade, and that a 5.0 mg/kg MRL is most likely to be applied for compliance monitoring, there is some uncertainty. Paul Hardman can be contacted if you have any queries on this matter (tel: 031 765 2514).

### Reminder: Post-harvest indications on the cartons

During May 2011 CGA communicated to growers and packhouse managers about the need to comply with the EU Community Standards for citrus (which have been incorporated into the Citrus Quality Standards) that require placing the post-harvest declaration on the business end of the carton (see Cutting Edge 117). After a transition period that allowed for existing stock to be used up, DAFF has requested that CGA duly notify packhouse managers that the current dispensation that allows for post-harvest declarations on the top and sides of the carton is unlikely to be renewed in 2013 and arrangements should already be in place to ensure future compliance with the EU Community Standards.

### GLOBALG.A.P Water Risk Assessments

In Cutting Edge No 147 the potential to use alternative water sample results (e.g. from local water boards) were considered in the context of the GLOBALG.A.P Fruit and Vegetable Standard (Version 4). Subsequent to the release of that Cutting Edge, the GLOBALG.A.P regional staff have contacted CGA and requested that the following clarifying statements are made in light of trying to maintain a consistent audit interpretation of the Standard. In terms of Control Point CB6.3.2 and CB6.3.3 "a risk assessment is always needed, where the producer would determine the need for water analysis and how often it shall be done. When a risk has been defined, the irrigation water shall be analyzed according to the determined frequency defined by the risk



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assessment. The risk assessment shall also consider FV.3.1.1 (water used in PPP mixes).”

Following the completion of a risk assessment, the real issue is whether water board test results are a reliable substitute for individual producer tests. Currently there is more than one view on this matter, and obviously water board tests will not be appropriate in all circumstances. However, the principle of being able to use alternative water tests, where appropriate, is important and requires further development. CGA are intending to raise this at the forthcoming Global G.A.P National Technical Workgroup meeting (proposed for September), with the view to formalize and agree to a set of criteria that if met may allow for the inclusion of alternative water sampling for the purposes of compliance to the Standard.

## Climate Change Workshops

CGA have asked the Climate Change project team to hold workshops as close to the production areas as possible. Workshops will therefore be held in the following growing regions over September 2012. This is a free workshop that makes it really easy to complete a Carbon Footprint calculation for the farming enterprise.

Date (2012)	Time	Area	Hosting Town
5 Sept	9 AM- 12 PM	Orange River	Upington
19 Sept	9 AM- 12 PM	Mpumalanga	Nelspruit
20 Sept	9 AM- 12 PM	Letsitele	Tzaneen
24 Sept	2 PM – 5 PM	Gamtoos Valley	Patensie
25 Sept	9 AM- 12 PM	Sundays River	Kirkwood
26 Sept	8 AM- 11 PM	Fort Beaufort	Fort Beaufort

Further workshops will follow in October 2012. Shelly Fuller is the person setting up the workshops and can be contacted on: Email: [shelly@climatefruitandwine.co.za](mailto:shelly@climatefruitandwine.co.za) or mobile: **084 555 6068**.

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