



Consumer Assurance Update

Post-harvest marking requirements

At the March 2014 Citrus Market Forum the issue of wax labelling was raised again as a requirement for the EU market under post-harvest marking requirements (see Cutting Edge 158 that deals with this issue). DAFF: Food Safety and Quality Assurance have indicated they are looking at the situation. The EU specific requirements are problematic given most exporters are using cartons printed for a range of markets and where some of those markets have alternative marking requirements for waxes other than those used by the EU. Cutting Edge No. 158 highlights that the level of enforcement of post-harvest requirements appears to vary across the EU and therefore exporters should discuss this requirement with receivers to reduce disruption to trade. Please contact Paul Hardman at CGA should you require further information on this topic.

Labelling requirements for India

This is just a notice to exporters shipping citrus fruit to India that specific information is required on the carton in order to expedite import procedures. The details of the requirement are contained in Notice No. 1-17/FSSAI/T/2012 (Part J) by the Food Safety and Standards Authority of India which can be obtained from CGA. Essentially the following information must be printed on the carton, but please check the notice to confirm requirements:

- Name of food
- Name and complete address of packer
- Date of packing
- Name and address of importer

Perchlorate residue in the EU

Over the last 12 months CGA has been observing how the EU Commission is approaching the situation around detected residues of perchlorate and chlorate in plant products in the EU. It became clear in 2013 that a wide-range of plant products contain perchlorate residues at levels higher than previously thought and that may be a concern for consumers. The exact source of the residues and pathways onto the plant products, and the risks, if any, to consumers, has been part of on-going investigations by relevant experts within the EU. Possible suggested sources of residue include some fertilizers, some pesticide formulations, sanitizers and also groundwater contamination. The European Food Safety Authority (EFSA) is expected to conclude a

scientific opinion on the matter by end of September 2014 (postponed from March 2014) and this will lead to a decision by the EU Commission on the future residue tolerances of perchlorate on plant products. In the meantime, it has been agreed that the temporary limits set in mid-2013 remain valid (0.5 mg/kg). This is due to be reconfirmed again with the Member States at the upcoming meeting on contaminants on 8 May 2014. CGA is currently not aware of any specific issue regarding SA citrus but this is something that will be monitored. CGA will communicate any EU regulatory changes accordingly.

Guazatine in the EU

A World Trade Organization notification (G/SPS/N/EU/70) published 4th April 2014 indicates that the EU has proposed reducing the citrus Guazatine MRL from 5.0 mg/kg to 0.5 mg/kg. If implemented, the new level would likely come into effect in six to eight months. This proposal is rather surprising as CGA is aware of an application for an import tolerance that would permit the continued use of Guazatine on fruit destined for the EU. The EFSA opinion on this import tolerance application is still pending. CGA will be engaging the EU Commission and relevant parties to retain the use of Guazatine on fruit for the EU market.

DDAC/BAC: Update on EU situation

- **Residue Levels for Cross-contamination:** In 2012 temporary tolerances were proposed and adopted by Member States to manage the potential cross-contamination of DDAC/BAC residue onto fruit when these substances are used as packhouse sanitizers. This level of 0.5 mg/kg has been in place since then but a proposal to reduce this level to 0.1 mg/kg has been considered by the Member States. However, the final decision to adopt the lower level, if at all, will largely depend on the conclusions contained in the EFSA Reasoned Opinion on the likely risks to consumers at different residue tolerance levels. EFSA was supposed to release this Opinion by 31st March 2014 but this is now expected in May 2014. The next Standing Committee on Pesticide residues will then likely vote on this issue in June 2014. If the 0.1 mg/kg level is adopted it is anticipated that member states would adopt a phase in period to allow for compliance to the lower level, but this is not guaranteed. CGA will communicate



any developments around this issue accordingly.

- **DDAC EU Import Tolerance Application:** The situation around the DDAC import tolerance remains the same as that communicated at CRI packhouse roadshows in February 2014. Effectively EFSA indicated they require some additional data (around animal consumption studies) in order to complete their assessment of the application. These data are being generated and will hopefully be submitted before the end of 2014. EFSA will then be in a position to complete their risk assessment and provide the Standing Committee on Pesticide Residues with a basis to take a decision on the import tolerance application. This means the import tolerance will only become effective in 2015 at the earliest.

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