



STANDARD OPERATING PROCEDURE FOR DITHIOCARBATE TESTING FOR EXPORT CITRUS TO CANADA

Background

Department of Agriculture, Forestry and Fisheries: Directorate Food Safety and Quality Assurance (DAFF: FSQA) published on the 9th June the Standard Operating Procedure that would be applicable for citrus fruit destined for Canada, which addresses the specific requirement for conducting Dithiocarbamate tests on export fruit. A copy of the applicable SOP is attached and this SOP came into effect on the 11th June 2014. The typical source of Dithiocarbamate resides on citrus would be Mancozeb sprays used to control Citrus Black Spot (CBS). Between 2011 and 2013 there were three official notifications from Canada regarding residue exceedances above the Canadian MRL of 0.1 mg/kg. In each of these cases the Canadian authorities have intensified sampling of fruit on arrival for the exporter concerned and as far as CGA is aware, closed out the issue and are reverting back to random sampling. However, on the notification of the third interception DAFF: FSQA indicated they would be implementing additional measures to avoid future exceedances of the Canadian Dithiocarbamate MRL for citrus.

Interpretation of the SOP

To provide clarity on the SOP, CGA has engaged with DAFF: FSQA and can indicate the following:

- Under Point 1 of SOP. All consignments must be linked to a relevant Dithiocarbamate test result, i.e. a test result can be used for multiple consignments provided that the sample was drawn from representative orchards of that PUC x product combination. If a consignment is made of fruit from multiple PUCs then test results for each PUC x product combination would need to be presented to the PPECB for that consignment.
- Applicable to the entire SOP: The results of commercial labs will be accepted (as currently the DAFF labs do not necessarily test for Dithiocarbamates), these tests could have been conducted prior to the SOP implementation date (but provided Dithiocarbamates were analysed for). The exporter/grower must provide analytical results to PPECB during inspection. From 11th June 2014 the PPECB will draw the samples for product where no test result can be presented, and these will be sent to the

commercial labs for analysis (at the cost of the grower/exporter). The PPECB will continue to draw random samples from packhouses as part of a general monitoring function.

- Fruit packed before the 11th June. Fruits that were passed for export waiting in the cold rooms or waiting for loading before the SOP came into effect can be exported without the test results.

CGA concerns with the SOP

There are a number of concerns raised with the implementation of this SOP and notwithstanding the need to provide our trading partners with the appropriate assurances that SA citrus complies with their import requirements and poses no consumer health risks. These concerns relate to:

- This SOP goes beyond the specific requirements laid out by the Canadian authorities,
- the timing of introduction of the SOP in the peak packing period and despite a number of requests to DAFF to have a practical phased-in approach,
- the appropriateness of the measure relative to the risks (and in particular the requirement to have tests done when the product has not been applied),
- the impact on trade given the EU-CBS situation,
- the cost implications, and
- the lack of prior engagement with all the affected parties.

CGA will be seeking to take these matters up with DAFF (SA) via the appropriate channels. Should there be any specific additional concerns please alert CGA to these.

Application for a higher Canadian Dithiocarbamate MRL

CGA has been pursuing a higher MRL for Mancozeb in Canada with the principle registration holder since 2010, but there has been little progress in this regard to date. Given these recent developments it is apparent that more needs to be done to directly apply for a higher MRL. The costs of such an application could be considerable but hopefully not prohibitive.

Compiled by
Paul Hardman