CRI Cutting Edge
RESEARCH NEWS FROM CITRUS RESEARCH INTERNATIONAL
August 2015 No 202

Export Citrus Post-harvest Treatment Labelling Considerations

Post-harvest treatments are utilized to counteract the pre-harvest, harvest and post-harvest factors that compromise fruit quality, thus enabling citrus exporters to present high quality fruit to customers in distant markets. The decision on which combination of South African registered treatments can be used on export citrus is determined by the receiving country, typically described in their food safety regulations. Compliance across a range of markets is challenging because the importing country's rules are becoming increasingly more unique and specific per market and they are changing more rapidly, sometimes mid-way through the export season.

It is the intent of this communication to summarize these post-harvest treatment labelling requirements for key markets as discussed at the post-harvest treatment labelling workshop held on 22nd July 2015 in Stellenbosch, and through other consultation with exporters and growers. A number of proposals were adopted at the workshop and expressed here. Sanitizers and plant growth regulators are not considered in this document because for many countries these are handled in different legislation to the post-harvest treatments, but information on these is available from CGA.

This communication is based on the assumption that the post-harvest treatments are used legally (i.e. according to the appropriate registration for that product and where such a treatment and residues are suitable for the intended market), and therefore can be declared as such. It is difficult to represent all the requirements in a single communication, therefore if any uncertainty remains then Paul Hardman (ph@cga.co.za) should be contacted.

Post-harvest treatment labelling Recommendations

1. In general, labelling of post-harvest treatments should preferably be on the business-end label and **not** on the carton itself. Carton manufactures and label providers will be advised on the implications of this requirement. Implementation: As soon as possible.
2. Post-harvest treatment indications on separate stickers are not recommended (i.e. it is better on the composite
3. business-end label) as import inspectorates are generally averse to the sticker applications for official purposes.
4. There is great value in having a common statement (wording) per market to reduce the possibility of confusion in the market and to eliminate the potential for receivers to use labelling as a competitive tool between exporters. Where applicable the recommended declarations here should be adopted in order to bring about uniform labelling conventions.
5. The use of the term "AND/OR" should be phased out and replaced with "AND" where two treatments are used. CGA will approach the DAFF: FSQA to apply for a change to the SA Citrus Export Standards.
6. The *Recommended Usage Restrictions for Plant Protection Products on Southern African Export Citrus* remains applicable.

Specific comments on post-harvest treatment labelling

1. **United Kingdom**: In July 2015 Rural Payments Agency (RPA) in the UK indicated to South Africa that the use of the term "AND/OR" was problematic and not specific enough. It is therefore recommended that for citrus entering this market the use of "AND" replaces "AND/OR". RPA granted the "dispensation" to allow cartons marked with the "AND/OR" terminology to enter the UK until the end of November 2015. UK cartons will need to be adjusted accordingly for the 2016 season.
2. **Russia**: While the implementation of additional food safety and recycling labelling requirements are variable across Russian receivers, the overall recommendation is to include these symbols for food safety and recycling respectively (see Annex 1).
3. **India**: The acceptability of the CODEX Alimentarius standards in the absence of specific Indian standards is a point of engagement with the Indian Authorities (Food Standards FSSAI). Until clarification on this situation is reached the Indian authorities (FSSAI) have indicated that Carnuba and Shellac waxes are permissible, while Oxidized

4. Polyethylene wax is not permitted. The South African Agricultural Councillor has also indicated that the CODEX Alimentarius MRL standards apply for fungicides in the absence of a specific National Indian MRL. This means in effect that Thiabendazole is permitted if used according to the Good Agricultural Practices (GAP). However, this rule does not seem to be applied consistently across India and will also be taken up with FSSAI shortly.
5. **Japan**: Post-harvest treatments must be listed as food additives in order to be used in a post-harvest context – the list of approved food additives is available from CGA.
6. **EU/Guazatine**: Although the SA citrus industry and the supplier of Guazatine to the SA citrus industry are endeavouring to retain the EU MRL for Guazatine, the European Commission has published its intent to reduce the MRL to the level of detection. A reduction in the MRL would preclude the use of Guazatine on export citrus to the EU.
7. **Pyrimethanil**: The recent authorization of Pyrimethanil as a post-harvest treatment means the standardized declaration for various markets will need to change to take this into account.

The table below summarizes the requirements per market.

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Table 1: Summary of post-harvest treatment declarations

Substance	SA	EU (Incl UK)	Japan	India	USA	Canada	CODEX	South Korea	Russia
Fungicides (Authorized Usages)									
Imazalil	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Thiabendazole	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Pyrimethanil	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Guazatine	Yes	Yes	No	Yes	No	No	Yes	No	Yes
Recommended standardized wording (where applicable)	Treated with: Imazalil, Thiabendazole and Pyrimethanil	Treated with: Imazalil, Thiabendazole and Pyrimethanil	"Treated with: Imazalil and Thiabenda-zole" if Pyrimethanil is not used.	Treated with: Imazalil, Thiabenda-zole and Pyrimethanil	Treated with: Imazalil, Thiabendazole and Pyrimethanil	Treated with: Imazalil, Thiabendazole and Pyrimethanil	Treated with: Imazalil, Thiabenda-zole and Pyrimethanil	Treated with: Imazalil, Thiabendazole and Pyrimethanil	Treated with: Imazalil, Thiabendazole and Pyrimethanil
Waxes									
Carnuba (E903)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Shellac (E904)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Oxidized Polyethylene (E914)	Yes	Yes	No	No	Yes	No	No	No	Yes
Recommended standardized wording (where applicable)	Treated with: E903, E904 & E914	Treated with: E903, E904 & E914	Treated with: E903 & E904	Treated with: Carnuba & Shellac	Treated with: E903, E904 & E914	Treated with: E903 & E904	Treated with: E903 & E904	Treated with: E903 & E904	Treated with: E903, E904 & E914
Use of codes (e.g. E904) in declaration	Permitted	Permitted	Permitted	Not Permitted	Presumed Permitted	Presumed Permitted	Permitted	Presumed Permitted	Presumed Permitted
Further Information									
Legislation	Agricultural Products Standards Act, 1990 (Act 119 of 1990)	Reg. EC/1333/2008 (Food Additives), Reg. EC/1221/2008 (Citrus Marketing Standards), Reg. EC/396/2005 (MRLs)	Food Safety Basic Law (Law No. 48 of 2003) and Food Sanitation Act (Act No. 233 of December 24, 1947)	Food Safety and Standards Act, No 34 of 2006. Food Safety and Standards Regulations 2011	US Code of Federal Regulations Title 21. Part 172.210	Food and Drug Regulations under the Food and Drug Act (1985)	CODEX STANDARD 192-1995		TR TS 005/2011
Other Recommendations									See Annex 1 - Russian Symbols

ANNEX 1: Russian Symbols

Recycling Indicator

Food Safety Indicator