



Consumer Assurance Update November 2015

1. Guazatine EU MRL Status

The European Union published Regulation EC/1910/2015 on the 21st October 2015 amending the Guazatine MRL on citrus. Effectively a new MRL of 0.05 mg/kg comes into effect on the 16th May 2016 for oranges and grapefruit (i.e. applicable to fruit in the market on that day). An MRL of 0.05 mg/kg will apply to all citrus other than oranges and grapefruit packed from the 16th May 2016 (i.e. for such fruit packed before the 16th May 2016 a MRL of 5.0 mg/kg will apply). It is very disappointing that the EU have proceeded to publish these new tolerances given the importance of Guazatine for Sour rot control, and also because of the anticipated challenges with alternatives for Sour rot control (see Cutting Edge No 204). CRI can be contacted (013 759 8000) regarding the use of alternatives to Guazatine. The citrus industry is concerned about this situation and will continue to engage the EU Commission.

2. US and EU Chlorpyrifos MRL

CGA have been aware of the ongoing review of active substances in the EU, with Chlorpyrifos being among those whose review concluded in 2015 with revised MRLs on many agricultural products. The citrus MRLs have not changed significantly with only the soft citrus MRL being reduced from 2.0 mg/kg to 1.5 mg/kg. The others remain at 0.3 mg/kg. None of the recommended usage restrictions required changing. Meanwhile in the US, the authorizations for uses of Chlorpyrifos in the US are under review. It is not yet clear how this review will impact on the Chlorpyrifos MRLs applicable on citrus produced in South Africa destined for the US, but at this stage the MRLs remain as they were.

3. Interaction with the Registrar of Act 36 of 1947

A number of matters have been brought to the attention of the CGA through interaction with the office of the Registrar of Act 36 of 1947:

- **Off-label use:** The Registrar has noted with concern some cases in the citrus industry where plant protection products have been used illegally and against the authorized use according to the label. In conjunction with this problem, recommendations are being made by plant protection product suppliers which are in fact illegal and often misleading. The Registrar has warned the industry

that this practice must cease and steps will be taken against offending firms not complying with the law. Growers are urged to ensure that the recommendations provided to them are firstly legitimate and secondly effective for their intended use. It is a great concern if growers are under the impression that their crops are being protected when in fact the application does not have any intended impact on the pest or disease, **especially in the case of phytosanitary organisms where control is paramount to retain market access.** Furthermore, the use of products at dosages outside the registered use has the potential to undermine the sustainable use of plant protection products by creating resistance problems.

- **Preventing Bird Poisoning:** South Africa is a signatory to the Convention on the Conservation of Migratory Species. Following the Southern African Workshop on Preventing Poisoning of Migratory Birds (24 August 2015, Cape Town) the Registrar has brought to CGA's attention the need to alert growers to this fact and that steps need to be taken to actively prevent the poisoning of migratory bird species. The workshop feedback is available from CGA but in practice the key action required by growers is to consider the potential impact of plant protection products on migratory species and to adopt safer alternatives and registered uses, where possible, on citrus farms.

4. The Appointment and use of private laboratories for official residue testing

DAFF: Food Safety and Quality Assurance (FSQA) have over the last 12 months amended their approach to official residue testing on exported products to bring the South African food safety systems in line with the expectations of trading partners. In particular a visit by the EU Food and Veterinary (FVO) mission in 2015 highlighted the need for a wider scope of active substances to be tested in official residue analysis. DAFF: FSQA have also recognized that many producers and exporters are already undertaking a large number of residue tests using commercial laboratories. Thus the changes by FSQA are intended to bring efficiencies into the process of providing our trading partners with the appropriate assurance of residue compliance while reducing duplication. There are three main considerations here:



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- PPECB is now drawing official samples that may be sent on to officially recognized commercial laboratories who have a wider scope of testing capability (see Table 1 below) and not necessarily DAFF Analytical Services laboratories. All the analytical costs will be for the Food Business Operator's (FBO) account. This means the FBO may be required to open an account with the laboratory concerned to settle any payments.
- FBOs are reminded that a statutory fee (R540 per sample) is in place for all pesticide residue samples drawn by PPECB.
- A process has been established whereby FBO's can apply to participate in a programme where their existing residue monitoring programme is recognized by DAFF: FSQA and PPECB. Recognized FBO's will be subject to less sampling by PPECB but will be required to submit their residue results as evidence of compliance. A formal application must be made with PPECB to participate in this programme and approval will be granted on the basis of compliance with the official protocol. The contact person at PPECB is Shubesco Heilbron (021 930 1134).

Should growers require any additional information on the above they can contact the CGA office (Paul Hardman, Tel 031 765 2514).

Table 1: Contact details of Officially Appointed Laboratories

Appointed Laboratory	Physical Address	Position of contact person	Contact person	Contact details
Hearshaw & Kinnes	9 Regent Park, Bell Crescent, Westlake Business Park Cape Town, South Africa	Technical Manager	Kevan Hearshaw	021 702-4131 kevan@hkal.co.za
Hortec	Unit D45, Olive Grove Industrial Estate, 5 Old Paardevlei Rd, Somerset West, 7130	Laboratory Manager	Wessel Kriek	021 851 1044 / 083 236 5522 wessel@hortec.co.za
SABS	1 Dr Lategan Road, Groenkloof, Pretoria	Manager Chromatographic Services – Residue Lab + Pesticide Trials	Hein Garbers	012 428 6648 hein.garbers@sabs.co.za
PPECB	119 Gerhard Street, Centurion Close, Centurion	General Manager: Laboratory	Dr. Dharmarai Naicker, PhD, Pr. Sci.Nat.	012 6647942 dharmarain@ppecb.com
Microchem	1 st Floor Fairweather House, 176 Sir Lowry Road, Woodstock, Cape Town	Managing Director	Raymond Hartley	021-465 6996 Raymond.hartley@microchem.co.za



5. Indonesian Update

The process to gain recognition of the South African Food Safety system as an equivalent system by the Indonesian authorities is still in play following the visit by the Indonesian officials earlier in the year. There has been a request for additional technical information since then and an official response provided. This has become somewhat of a frustrating process and CGA & CRI continue to engage with DAFF: FSQA to keep the application moving forward. CGA appreciates the work being done here by DAFF: FSQA and the staff in Jakarta, notably Willem Geerlings. Meanwhile, the Indonesian Ministry of Trade (MOT) has recently published revised rules around permits for imported fruit – Regulation 71/2015. Given the indirect effects these permits have on exports to Indonesia exporters should note these developments and duly discuss them with the Indonesian importer. CGA has a summary on the new rules – please contact Paul Hardman for a copy.

6. South Korean Food Business Operator Registration

Exporters shipping citrus to South Korea should be aware of new registration procedure for food business, introduced with Article 5 of the Special Act on Imported Food Safety Control and Article 2.1, 2.2, 2.6, 2.9 of the Enforcement Rule of the Special Act on Imported Food Safety Control. Exporters should consult with their receivers in South Korea about this new rule in order to comply in the 2016 export season.

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