



Japan Carton Declarations in 2016

On the 31st March 2016 exporters shipping citrus fruit to Japan were invited to participate in a teleconference discussion around the post-harvest declaration requirements for Japan in 2016. This meeting had been called in light of potential confusion around post-harvest declaration rules and also to ensure that appropriate risk management steps are taken at an industry level to prevent uncertainty and non-compliance in the market.

From a technical perspective, there are sound reasons for maintaining a consistent and uniform message about post-harvest treatment options available and used on citrus in South Africa. These reasons include:

- Post-harvest diseases can develop resistance to fungicides over time and it is critical that chemistry is used in combination to prevent the rapid progression to resistance problems. Any standardized declaration must at least not prevent pursuing good resistance management practices.
- It is a requirement that the post-harvest treatments are stipulated on the carton itself for Japan. However some fungicides are used depending on recent weather patterns. The decision to use or not to use such fungicides is taken after the cartons are printed. Standardized wording prevents this time lapse issue becoming a problem.
- In the market, and especially on the retail shelf, it can be difficult to separate fruits that have been treated differently. Standardized wording covers a potential non-conformance that might arise when fruit is mixed together.
- Trying to predict at what stage packhouse residues are low enough after the active is no longer used in the packhouse before ceasing to declare an active is a complex problem.

The group noted that it was sometimes problematic that residue tests show no detectable residues despite the declaration on the carton, and may be seen almost as fraud. It is therefore important to have a clear communication across all exporters so that such a view is not adopted.

The scope of the discussion was limited to the Japan market, where cartons are specifically manufactured for this market. The approached

used here should therefore not materially impact fruit destined to other markets or into other channels (e.g. for juice).

Taking all the above into consideration and understanding that this issue is better addressed collectively, the exporters shipping fruit to Japan agreed to the following:

- **From the beginning of the 2016 season all cartons exported to Japan should have the post-harvest declaration reading: Treated with Imazalil, Thiabendazole and Pyrimethanil**
- **This wording should be in both English and Japanese.**

(An example of the text is available from CGA)

The above implies that all cartons already printed with other markings will need to have stickers applied to them. DAFF have confirmed that stickers are permitted for post-harvest declarations provided the sticker covers the entire underlying declaration. DAFF have advised that good quality stickers must be used (so that underlying markings do not show through), and the stickers must be able to effectively adhere to cartons despite the expected changes in temperature and humidity the carton is subjected to during transit. DAFF have also indicated the Durban Regional office can be contacted should you want to verify the acceptability of the labelling prior to shipment.

It was noted that wax declarations have historically been made by the majority of exporters in the business-end label. Exporters to Japan agreed this should be practiced across all cartons, typically using the wax codes, i.e. Treated with E903 and E904.

Compiled by
Paul Hardman
Industry Affairs Manager
Citrus Growers Association