



Fosetyl-AI, Phosphorous acid and Phosphonates MRLs

Background

Recent uncertainty around the applicable MRLs for Fosetyl-AI, Phosphorous Acid and Phosphonates has triggered this Cutting Edge. Renewed focus on the MRLs was brought about when the EU reviewed the Fosetyl-AI and Phosphorous MRLs in 2014. We lowered the Default Export MRL for Fosetyl-AI on citrus from 15 mg/kg for citrus to level of detection (2.0 mg/kg) in anticipation of what may come out of the process. Whereas the eventual reduction of the EU MRLs for a number of horticultural products precluded the use of these products in the current production season for affected commodities, the EU citrus MRLs were set at 75 mg/kg for all citrus types.

To date there have been no rejections of fruit in the market (EU and other) but some rejections of consignments have apparently occurred here in South Africa - the reasons for this are discussed below under the RSA Default MRLs.

Residue Definition

There has also been further confusion in this matter around the applicable residue definition for this group of products. In the EU the Fosetyl-AI MRL includes phosphorous acid and the phosphonates (which may be a result from using phosphorous fertilizers). In South Africa we have generally reported the Fosetyl-AI MRL and phosphorous acid separately – which is largely based on the manner in which Department of Health (DoH) has reported the MRLs. In practice, the two residues should be combined, as in the EU, to get a sum of the residues resulting from Fosetyl-AI, phosphorous acid and fertilizers that result in phosphonates. What this means is the residues on the fruit need to be below the highest of either Fosetyl-AI or Phosphorous Acid MRLs in each market.

RSA default export Fosetyl-AI MRL

Whereas the precautionary step lowered the default export MRL in the Recommended Usage Restrictions to 2.0 mg/kg, the actual recommended usage restriction was never changed. The conclusion of the EU MRL revision means that the Fosetyl-AI default MRL in the Recommended Usage Restrictions document needs to be increased to reflect the EU changes and to be brought back in line with the RSA MRL of 15 mg/kg. This would also terminate the unnecessary rejections of export fruit here in SA when in fact

they comply with both the importing country's requirements and local MRLs.

Appropriate changes will be made in the next version of the Recommended Usage Restrictions document, but have already been implemented by DAFF and PPECB for the current export crop. In summary the default MRL for Fosetyl-AI for all citrus types will be changed from 2.0 mg/kg back to 15 mg/kg. The Recommended Usage Restriction will remain at 0 d PHI as registered.

Future RSA default Fosetyl-AI MRL

Since RSA has been reporting the MRLs for Fosetyl-AI and Phosphorous Acid separately and this has led to some confusion, CGA are engaging DoH and the Registrar of Act 36 of 1947 and other stakeholders to combine the residues and make the Fosetyl-AI MRL the sum of all the uses of Fosetyl-AI, phosphorous acid and products that result in phosphonates. This will bring the SA approach in line with the EU, without necessarily impacting the other markets. Should anybody have a strong view on this and can make a meaningful contribution then please be in contact with CGA.

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