



Cutting Edge/Snykant

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UPDATE ON MRL MATTERS

Recommended Usage Restrictions Revisions

Currently the applicable Recommended Usage Restrictions for Plant Protection Products are those set out in the March 2008 edition. A revision of this document will be completed by CRI/CGA at the end of August following meetings with experts in the UK and Europe.

Although already indicated in the March 2008 edition, based on the number of queries received by CGA special mention is made again of the changes to the Buprofezin restrictions. From 1st September 2008 the **Buprofezin** usage restriction will be **45 days PHI**.

Sodium ortho-phenyl phenol (SOPP)

Cutting Edge No 66 (SOPP) refers, which indicated that the use of SOPP should be suspended with immediate effect due to the failure of efforts to retain an EU MRL for SOPP on citrus, and that the SOPP MRL would most likely be changed to Limit of Determination (0.01mg/kg) on 1st September 2008.

More recent communication from the Pesticide Safety Directorate (PSD) in the UK, however, indicates that the use of SOPP can be continued. PSD consulted with the EU authorities who confirm that SOPP is exempted from plant protection product regulations/controls by virtue of the fact that this substance is classed as a Preservative under food additives legislation¹. The applicable residue tolerance for SOPP is therefore the Preservative MRL for SOPP (12.0 mg/kg) and not Limit of Determination (0.01 mg/kg).

The current RSA MRL for SOPP is 10.0 mg/kg. **The General Export Tolerance will therefore remain at 10.0 mg/kg in the Recommended Usage Restrictions for Plant Protection Products on Southern African Citrus Exports.** CGA apologizes for any confusion this set of circumstances may have caused.

¹ Article 2.1.3 of EC Directive 91/414 specifically exempts preservatives from the definition of plant protection product active substances. Food Additives legislation, Directive 2003/114/EC

Malathion/ Mercaptothion

During June CGA/CRI were informed that from 31st January 2009 it was possible that the EU Malathion MRL could be set at 0.01 mg/kg following the outcome of a process to change the residue definition of Malathion to include all metabolites. This proposed change would lead to the acrimonious situation where the current General Export Tolerance (2.0 mg/kg) would be raised to 7.0 mg/kg on the 1st September 2008 (when all EU MRLs are harmonized), only to be revoked again on the 31st January 2009.

CGA/CRI prepared Malathion residue breakdown data during the 2006/7 season in order to apply for an EU Import Tolerance. PSD have been engaged and this data is being sent across to the UK for evaluation before the end of 2008. Only once the evaluation is complete will the future status of the EU Malathion MRL be known. Although a more practical MRL than 0.01 mg/kg may be set, we must take a conservative approach.

Any use of Malathion after petal fall will likely lead to detectable residues. It is therefore pertinent to restrict the use of Malathion for the 2009 export season until the final status of the EU Malathion MRL on citrus has been determined. Restrictions will be set out in the Recommended Usage Restrictions document as follows:

All markets except where other restrictions apply: Not later than 90% petal fall. Korea: 14d PHI for oranges and 28d PHI on other citrus (only dilute concentration, do not use higher concentrations).

CODEX: 7d PHI

Canada: 14d PHI for oranges and 28d PHI on other citrus.

USA: 7d PHI

Japan: 7d PHI

Please note that the MRL for Trichlorfon (Dipterex) remains unchanged,

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