



## **FOLLOW UP: QUATERNARY AMMONIUM COMPOUND (QAC) RESIDUE CAUTIONARY**

Dear citrus growers, packhouse managers and exporters,

Following Cutting Edge 87 that informed the SA citrus industry of the recent reported detection of Didecyldimethyl ammonium Chloride (DDAC) on grapefruit in Japan, this notice seeks to provide an update of this situation. CGA/CRI engaged with the Japanese Importers Association who in turn raised this matter with the Japanese authority (MHLW). It was inevitable that MHLW would be notified as receivers in Japan are obliged to inform them of potential MRL exceedances.

Early in the engagement process MHLW made it very clear that any transgression of the Food Additives legislation would be seen as a violation of Japanese Food Safety Law. The consequence of a violation is the immediate recall of fruit already in the market and the prohibition of sale of any further fruit suspected to have been treated with an unauthorised chemical. The use of QACs as a disinfectant does however create a unique situation and the status of DDAC in this context has been the subsequent focus of the engagement with the Japanese.

CGA/CRI have argued that QACs are widely used around the globe as disinfectants, are safe products (have a favourable toxicological profile), and recent local and international studies have never led the SA citrus industry to believe that there was potential to exceed the residue tolerance (0.01 mg/kg) in Japan or elsewhere in the world. These recent detections seem therefore to be the result of a new analytical method for residue testing in Japan. Since this is a new development and given the potential for significant trade disruption CGA/CRI requested MHLW to consider setting a

provisional MRL to allow the current fruit in Japan and fruit destined for Japan to be permitted onto the market. In future the SA citrus industry would pursue an Import Tolerance to facilitate the continued use of disinfectants in packhouses packing fruit for Japan.

Feedback received from Japan on 13<sup>th</sup> July 2009 indicate that the decision on whether DDAC should be deemed a Food Additive (by Japanese definition) or disinfectant has been deferred to MHLW head office. If seen as a disinfectant MHLW will also consider what the applicable tolerance should be.

In conclusion, until a final decision has been reached by MHLW it remains critical that packhouse managers understand the potential risks. It is hoped MHLW will view this situation with reason and allow fruit already in the pipeline to be released onto the market, but it seems unlikely that treated-fruit that has not yet been shipped will be permitted.

Kind regards  
Paul Hardman  
Citrus Growers Association  
+27 82 880 7933

