



CONSUMER ASSURANCE UPDATE

Taiwan Carnauba Wax

Subsequent to the Cutting Edge precautionary regarding the carnauba wax situation in Taiwan, CGA can report the following:

- 1) It has been confirmed repeatedly now that Carnauba wax is not permitted on fresh fruit in Taiwan and therefore fruit found to be treated with carnauba wax will be rejected. There has been a recent additional case where the cartons were marked as having been treated with carnauba wax, and this led to the inspector requiring additional information from the exporter to try to clear the fruit.
- 2) Looking forward to a permanent solution and by working through an importer, CGA has provided appropriate data to make an application for carnauba wax to be approved for use on fresh citrus. This application was made on 28 June 2022.
- 3) After the application was made the Taiwan Food and Drug Administration (TFDA) raised some clarifying queries about the typical uses of the carnauba wax on fresh citrus as it pertains to citrus exported to Taiwan. All these queries were addressed at the time.
- 4) This week the Liaison of South Africa (LOSA) in Taipei provided a letter to the importer, and shared this with CGA, which suggests the application had been making progress. CGA/CRI provided additional feedback on the points raised in the letter.
- 5) Unfortunately the letter also indicates that two additional research projects have to be submitted to estimate the dietary exposure Taiwanese consumers might face if Carnauba wax is used. The importer is making enquires to establish the costs and timelines for getting such research completed.
- 6) Typically applications take about two years to process. However from the informal correspondence received so far it is hoped the approval period is much quicker.
- 7) Until further notice packers and exporters should not be treating citrus fruit destined for Taiwan with Carnauba wax.

When CGA becomes notified of developments around the approval of Carnauba wax this

information will be shared with the southern African citrus industry accordingly.

Recommended Usage Restrictions (RUR) Update (July 2022, #52)

A very large number of MRL changes have been incorporated in the latest version of the *Recommended Usage Restrictions for Plant Protection Products on Southern African Export Citrus*. These are in line with what was previously communicated (Cutting Edge # 345), and in an attempt to make the values more clear in the document. Also CGA and DALRRD have been working on aligning MRLs published by DALRRD and those within the RUR, which has also introduced some amendments.

Many of the changes have no material impact on how actives need to be used but the key changes can be found in the SUMMARY TABLE OF CHANGES towards the end of the document. Given the large number of changes it would be appropriate to cross-check the RUR information for ALL actives that are likely to be used in the next production cycle.

Off-label uses not permitted

CGA was approached by Crop Life regarding rumours of off-label uses of some actives, particularly around the plant growth regulators (PGRs). CGA is following up on these possible offences but needing to alert growers to the fact that this is illegal and potentially poses a serious risk to the good standing and reputation of the southern African citrus industry. Products are formulated to operate in a particular way and any off-label uses could lead to greater exposure to operators, by-standards and consumers.

Another serious concern is that off-label uses could lead to a process where the registered product comes under threat. The loss of available crop protection products is accelerating and any actions that result in the further loss of the available tools will be problematic, especially in the PGR category.

De-registration of PPP based on GHS classification

The Registrar of Act 36 of 1947 distributed a letter in April 2022 to the crop protection industry notifying the industry that from 1 June 2024 active



substances with an undesirable carcinogenicity, mutagenicity and reproductive toxicity classification under the Global Harmonized System of Classification and Labelling of Chemicals (GHS) would have their registration withdrawn. In particular, any substance that has 1A and 1B classification would be implicated.

CGA/CRI are aware of these developments and actively participating in engagement with various stakeholders to establish which active substances and products might be affected. A working group has been established under Crop Life and expertise brought in to guide the process. This is not a straightforward exercise given the technicalities and different formulations of active substances. Should parties require more information about these developments in the context of the citrus industry, please contact CGA (ph@cga.co.za).

Compiled by Paul Hardman, CGA.