



Export Citrus Post-harvest Treatment Declarations and Labelling Considerations for 2020

Post-harvest treatments are utilized to counteract the pre-harvest, harvest and post-harvest factors that compromise fruit quality, thus enabling citrus exporters to present high quality fruit to customers in distant markets. The combination of South African registered treatments permitted for use on export citrus is determined by the receiving country, typically described in their food safety regulations. Compliance across a range of markets is challenging because the importing country's rules are becoming increasingly more unique and specific and they are changing more rapidly, sometimes mid-way through the export season.

It is the intent of this communication to update (following the previous Cutting Edge 202 on this topic) and summarize these post-harvest treatment labelling requirements for key markets taking into consideration recent new product registrations and feedback from exporters.

Sanitizers and plant growth regulators are not considered in this document because for many countries these are handled in different legislation to the post-harvest treatments, and are not generally required to be declared on the carton, however information on these is available from CGA.

This communication is based on the assumption that the post-harvest treatments are used legally (i.e. according to the appropriate registration for that product and where such a treatment and residues are suitable for the intended market), and therefore can be declared as such. It is difficult to represent all the requirements in a single communication so if any uncertainty remains CGA (ph@cga.co.za) should be contacted.

Post-harvest treatment labelling Recommendations

1. In general, labelling of post-harvest treatments should preferably be on the business-end label and **not** on the carton itself. Carton manufactures and label providers will be advised on the implications of this requirement. Implementation: As soon as possible.
2. Post-harvest treatment indications on separate stickers is not recommended (i.e. it is better on the composite business-end label) as import inspectorates are

generally averse to the sticker applications for official purposes.

3. There is great value in having a common statement (wording) per market to reduce the possibility of confusion in the market and to eliminate the potential for receivers to use labelling as a competitive tool between exporters. Where applicable, the recommended declarations here should be adopted in order to bring about uniform labelling conventions. There is evidence that buyers in some markets threaten to use post-harvest declarations as a means to differential between exporters despite the negative impact this might have on long-term sustainability.
4. The use of the term "AND/OR" must be phased out and replaced with "AND" where two or more treatments are used. The current wording in the SA Citrus Export Standards published by DALRRD: FSQA is: *'If the citrus fruit concerned have been post-harvest treated with a preserving agent or other chemical substances it shall be indicated on the business side of the container, preceded by the expression "Treated with".'*
5. The *Recommended Usage Restrictions for Plant Protection Products on Southern African Export Citrus* published by CGA/CRI remains applicable.

Specific comments on post-harvest treatment declarations

1. **Azoxystrobin:** There are now azoxystrobin post-harvest products registered in South Africa on citrus. Any use of this active should follow the guidelines laid out in this document.
2. **European Union:** Revised imazalil MRLs apply for oranges and grapefruit from 16th April 2020, but no changes to labelling or declarations are required following these changes. It is expected that the proposed lower MRLs for prochloraz will come into effect during 2020 but the actual dates for these changes remain uncertain.
3. **United Kingdom:** "AND/OR" should not be used in the post-harvest declarations.
4. **Russia:** While the implementation of additional food safety and recycling labelling requirements are variable across Russian receivers, the overall recommendation is to include these



symbols for food safety and recycling respectively (see Annex 1).

5. **India:** Great care must be taken when shipping citrus to India given the array of challenges that present themselves to exporters on fruit arrival. These challenges include: 1) Ongoing modernization of the Indian Food Safety Laws and particularly the institutional arrangements around publishing applicable tolerances for plant protection products, resulting in uncertainty about the applicable MRLs, 2) Carnauba and Shellac waxes are permissible while Oxidized Polyethylene wax is not permitted, 3) MRLs can be problematic (with special sensitivity to thiabendazole) and 4) different interpretations of these rules at different ports of entry. In fact, the Indian tolerances are among the most restrictive and exporters sending fruit to this market are encouraged to engage with CGA to obtain more detail on the requirements to avoid any consignment rejections.
6. **Japan:** Firstly, all post-harvest treatments must be listed as “food additives” under Japanese law in order to be used in a post-harvest context – the list of approved food additives is available from CGA. Secondly, some exporters had fruit rejected in Japan when post-harvest treatment residues were **not** detected while the carton displayed the standard declaration. This problem seems isolated to fruit entering Kobe port. In trying to avoid this problem some exporters may move away from general to specific declarations. The citrus industry needs to be aware that the use of alternative declarations undermines the ability of the citrus sector to simplify the export process and introduces a major risk that buyers will begin requesting their own set of declarations, which in turn could lead to competitive behaviour on the basis of fewer active ingredients. Great care must be taken so these negative outcomes are avoided. Nevertheless, it does seem inevitable that standardized wording will not work in all situations.

The table below summarizes the requirements per market.



Table 1: Summary of post-harvest treatment declarations

| Substance | SA | EU (Incl UK) | Japan | India | USA | Canada | Taiwan | CODEX | South Korea | Russia | Other |
|---|--|--|--|----------|--|--|--|--|--|--|--|
| Fungicides (Authorized Usages) | | | | | | | | | | | |
| Azoxystrobin | Yes | Yes | Yes | No | Yes | Yes | Yes | Yes | Yes | Unknown | China: No for oranges, yes for other citrus types |
| Fludioxonil | Yes | Yes | Yes | No | Yes | Yes | Yes | Yes | Yes | Unknown | |
| Guazatine | Yes | No | No | Yes | No | No | Yes | Yes | No | Yes | |
| Imazalil | Yes | Yes | Yes | No *** | Yes | Yes | Yes | Yes | Yes | Yes | |
| Prochloraz | Yes | Yes * | Yes for oranges | No | No | No | No | Yes | Soft Citrus Only | Unknown | |
| Propiconazole | Yes | Yes ** | Yes | No | Yes | Yes | Yes for oranges, lemons and grapefruit. | Yes | Yes | Unknown | "No" for Hong Kong, Vietnam, GSO countries |
| Pyrimethanil | Yes | Yes | Yes | No | Yes | Yes | Yes | Yes | Yes | Yes | |
| SOPP | Yes | Yes | Yes | No | Yes | Yes | Yes | Yes | Yes | Unknown | |
| Thiabendazole | Yes | Yes | Yes | No | Yes | Yes | Yes | Yes | Yes | Yes | |
| Recommended standardized wording (where applicable) | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil | "Treated with: Imazalil and Thiabendazole " or "Treated with: Imazalil, Pyrimethanil and Thiabendazole " | None *** | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil | Treated with: Imazalil, Thiabendazole and Pyrimethanil |
| Waxes | | | | | | | | | | | |
| Carnauba (E903) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | |
| Shellac (E904) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | |
| Oxidized Polyethylene (E914) | Yes | Yes | No | No | Yes | No | Unknown | No | No | Yes | |

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|---|---|---|---|---|---|--|---------------------------|---------------------------|---------------------------|---------------------------------|--------------|
| Recommended standardized wording (where applicable) | Treated with: E903, E904 & E914 | Treated with: E903, E904 & E914 | Treated with: E903 & E904 | Treated with: Carnauba & Shellac | Treated with: E903, E904 & E914 | Treated with: E903 & E904 | Treated with: E903 & E904 | Treated with: E903 & E904 | Treated with: E903 & E904 | Treated with: E903, E904 & E914 | |
| Use of codes (e.g. E904) in declaration | Permitted | Permitted | Permitted | Not Permitted | Presumed Permitted | Presumed Permitted | Presumed Permitted | Permitted | Presumed Permitted | Presumed Permitted | |
| Further Information | | | | | | | | | | | |
| Legislation | Agricultural Products Standards Act, 1990 (Act 119 of 1990) | Reg. EC/1333/2008 (Food Additives), Reg. EC/1221/2008 (Citrus Marketing Standards), Reg. EC/396/2005 (MRLs) | Food Safety Basic Law (Law No. 48 of 2003) and Food Sanitation Act (Act No. 233 of December 24, 1947) | Food Safety and Standards Act, No 34 of 2006. Food Safety and Standards Regulations, 2011 | US Code of Federal Regulations Title 21. Part 172.210 | Food and Drug Regulations under the Food and Drug Act (1985) | | CODEX STANDARD 192-1995 | | TR TS 005/2011 | GB 2763-2019 |
| Other Recommendations | | | | | | | | | | See Annex 1 - Russian Symbols | |

* The European Commission has notified of their intention to reduce the Prochloraz EU MRL for citrus to 0.01mg/kg, however it is currently uncertain whether and when this new tolerance will apply.

** The European Commission has notified of their intention to reduce the Propiconazole EU MRL for citrus to 0.01mg/kg, however it is currently uncertain whether and when this new tolerance will apply.

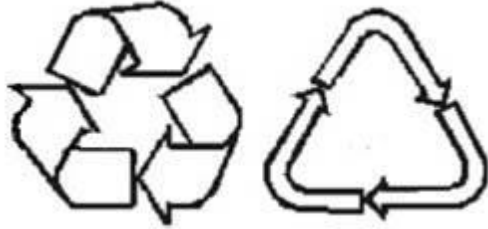
*** Given the rapid changes to the Indian market requirements for post-harvest declarations, please engage CGA to confirm the latest declarations prior to shipping.

Compiled by
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ANNEX 1: Russian Symbols

Recycling Indicator



Food Safety Indicator

