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MRL Standard Operating Procedure

Being recognised as a reliable supplier that consistently adheres to maximum residue levels is an important competitive advantage in the international trade arena. By Paul Hardman

when it comes to MRL compliance. In 2021 the citrus industry of SA appeared on this list five times, well below countries like Turkey (with 175 cases in 2021 alone). Of course, the goal is to have no MRL exceedances, but given the large volume of fruit exported to the EU market this is an outstanding result. In all the South African cases these are marginal exceedances of the MRLs, therefore, they have little food safety risk due to the safety factors built into the MRL calculations. And they are caused by circumstances largely outside the control of the producer or packhouse (e.g. cross-contamination from legacy uses). Nevertheless, any exceedance of the MRL must be handled correctly and this is where the DALRRD MRL SOP (Department of Land Reform and Rural Development MRL Standard Operating Procedure) comes into play.

DALRRD MRL SOP

The DALRRD MRL SOP unofficially refers to the Standard Operating Procedure on Sampling and Analysis of Agricultural Products of Plant Origin to Determine Agro-Chemical Residue Levels and Risk Management as Part of the Export Inspection and Certification Terms of the Agricultural Product Standards Act. As the full name suggests, the main focus of the SOP is to provide direction to role-players for sampling and monitoring of export fruit in a comprehensive residue monitoring programme.

The DALRRD MRL SOP was last updated in October 2018 and covers the following topics: sampling frequency, sampling procedures for representative sampling, handling and dispatching of samples, sample analysis and the laboratories appointed to handle official

samples, reporting of results, evaluation of compliance, how to handle MRL exceedances, and a description of the appeal processes available to stakeholders.

In the context of citrus fruit exports, the Perishable Products Export Control Board (PPECB) is a key role-player (assignee) here and draws samples in accordance with the DALRRD MRL SOP. They then use the results to decide whether the destination country selected by the exporter is permitted or not.

Handling non-compliance

In a recent engagement, DALRRD: Directorate Food Safety and Quality Assurance (FSQA) raised concerns that when exceedances occur in importing countries, the exporters were not following the DALRRD MRL SOP. Exporters must inform the FSQA within three working days of receiving an exceedance notification. Often these notifications arrive long after the fruit had been sold. However, the FSQA still needs to be informed.

Exporters are also requested to inform the CGA of any exceedances to determine if this is an isolated case or part of a bigger underlying problem with a particular active or batch of PPP. Typically, the CGA finds that the Recommended Usage Restrictions have been followed, but that there is an underlying issue that the producers or packer may not have been aware of. By communicating exceedances to the CGA the wider industry can be protected, and any further non-compliances can be avoided. It is also valuable information to feed back to Citrus Research International (CRI) for identification of research needs.

An exceedance also triggers a process that must be followed to handle that fruit (see Figure 1). Action is firstly limited to the consignment in question, where the exporter must recall, destroy or reroute the consignments. The appropriate options depend on whether the fruit has already been shipped or not. The most preferred option is usually to establish if that fruit might be

acceptable in another market. For example, if the detected residue is below the CODEX MRL, then the consignment would be suitable for countries that don't have a national MRL set, and that recognise the CODEX MRLs. Exporters need to provide PPECB and FSQA with proof of the alternative intended market, in the form of an affidavit.

The MRL SOP also stipulates that where exceedances occur, more frequent sampling is required to demonstrate that an appropriate correction has been made and the risk of further exceedances is low. Here, the MRL SOP makes provision for the utilisation of private results to fast track the decision-making process. Packhouse managers should be aware that samples still need to be drawn by PPECB, but sent to the client's preferred analytical service provider. The CGA advises growers to speak to the PPECB before undertaking this additional sampling and analysis, to ensure that all actions are with the SOP and the results can be used by the PPECB.

Exporters must inform the FSQA within three working days of receiving an exceedance, even if the fruit had already been sold.

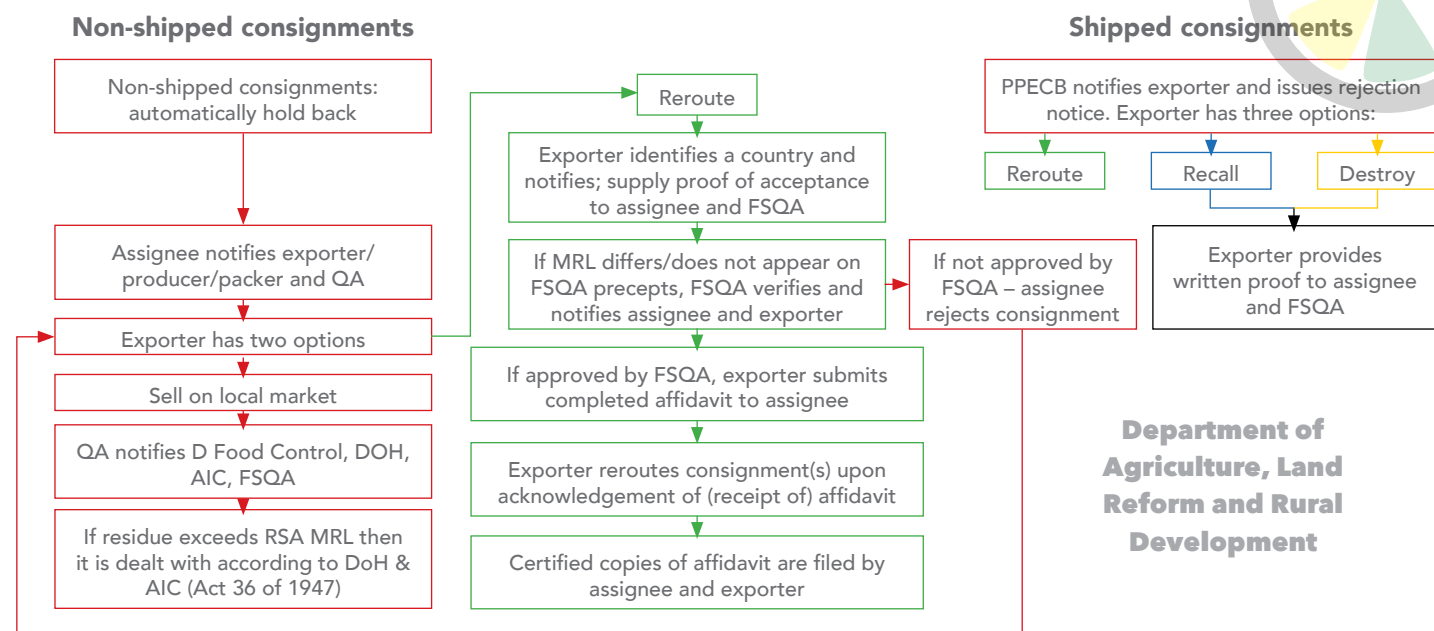
Follow the Recommended Usage Restrictions

The options and obligations associated with an exceedance have been briefly described above. However, zero exceedances is the ideal to strive for. The CGA/CRI Recommended Usage Restrictions document – available from the CGA, along with copies of the DALRRD MRL SOP – will help growers to apply PPPs in the correct windows. ▮

The South African export fruit industries have an excellent track record regarding compliance with maximum residue levels (MRLs) for plant protection products (PPPs). South Africa's good performance is based on industry and government systems developed over years, like DALRRD MRL SOP.

Good performance

Resources such as the EU Rapid Alert Systems for Food and Feed (RASFF) are a clear indication of a nation's performance



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- candidates available for recruitment
- new resources and learning materials
- upcoming courses and events
- the newly-introduced HR button on the home page. ▮

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