

HISTORY OF THE RECOMMENDED
USAGE RESTRICTIONS

Plant protection products on Southern African export citrus

Vaughan Hattingh (CEO, Citrus Research International) recently shared an early version (October 1992) of the *Recommended Usage Restrictions* (RUR) document, which he had come across amongst the archives. By Paul Hardman¹

The *Recommended Usage Restrictions* (RUR) is an important vehicle of communication to the Southern African citrus industry. And looking at the earlier October 1992 version has highlighted the considerable change that this document has undergone since then. This is commensurate with the vast evolution in the industry in the last 28 years. And yet the core elements of the RUR were there right from the start. The article reflects on the more interesting aspects of this RUR publication over the course of time.

Early beginnings

The need for a coordinated central reference of Maximum Residue Levels (MRLs) and, more importantly, how to use plant protection products to ensure compliance with these MRLs pre-dates the deregulation of the citrus industry in SA – and therefore, also the establishment of the CGA or CRI.

Starting in the 70s, just as volumes of export citrus were on the rise and mostly destined for Europe, signatories to the European Economic Council (EEC) were proactively trying to set uniform MRLs across EEC members². This process was intended to simplify trade (especially internal European trade) but in reality created a patchwork of different tolerances as countries published MRLs separately, while also having Europe-wide levels. It was almost impossible to produce citrus, taking all constraints into consideration.

Initially under the Outspan single-desk marketing channel and along with a larger extension footprint, it was more feasible to match demand and supply to specific market segments. Yet, even this became increasingly challenging as efforts to harmonise the EU MRLs were intensifying – often causing MRLs to be lowered or withdrawn completely at short notice – with revised regulations published in the early 1990s³.

Deregulation and EU consolidation

It was at this time that the citrus industry began more direct engagement with the European food safety authorities and under instruction from Ian Moore, Vaughan took up the mantle and developed the first RUR communication for the industry. The information was channelled to producers via the extension services. The 1992 edition referred to earlier was directed to Drs T Grout and L Marias, and Messrs H Le Roux and T Schutte with additional information in a memo. This approach continued through deregulation and the establishment of CGA and CRI. By 2003 CRI had published 18 versions of the RUR.

I joined CGA in 2003 and was immediately sent down to Stellenbosch to meet Vaughan and become his understudy on updating the RUR. This was in the wake of the sudden and unexpected changes in the EU 2,4-D

tolerances, and a decision by the CGA board that dedicated resources were needed to monitor all market import requirements.

When I arrived on the scene, matters that were at play included a proliferation of temporary EU MRLs (tMRLs), recent releases of the go-to resource for local registrations – *Bot se boek*⁴, and Japan published drafts of the Food Sanitation Law to introduce their Positive List System. I recall having to work through huge volumes published by the Japan Ministry of Labour, Health and Welfare, trying to assess which MRLs might be problematic for the Japanese market. As it turns out, during the 2005 season 8.2 million cartons were inspected and passed for Japan – the largest volumes ever to go to that market.

Since 2003 another 47 editions of the RUR have been published – or approximately three per annum. These are distributed through the CRI Study Groups and via the CGA Communications Tool to growers and stakeholders (approximately 2200 recipients). The major changes to the document over time include:

1. Listing CODEX ALIMENTARIS MRLs
2. Adding South Korean MRLs
3. A column for where restrictions apply to additional markets (i.e. South Korea, Taiwan, Thailand, China, Hong Kong, Gulf State Organisation)

4. Initially, there were approximately 76 active substances listed compared to 107 in the May 2020 edition.

Although it is recognised that the format of the RUR can at times appear confusing and does not display all the information about all the markets Southern Africa exports fruit to, the current set-up actually takes all those requirements into consideration. This helps to simplify the decision-making process for users. The underlying information is held by CGA and each change is linked back to dependable data sources. Where specific explanations are needed, the CRI Cutting Edge is used to communicate this detail.

Science-based approach

From the start all recommendations are tied back to sound residue breakdown data. Where this is not available CGA/CRI works to try and fill these gaps for important active substances. Only using robust scientific evidence may appear obvious, but in light of the significant pressure applied by the buyers at times, the principle of following empirical evidence has stood the industry in good stead. There are many examples of active substances that may have lost value as a crop protection product, had a different approach been followed (i.e. Imazalil). From 2004 to 2008 the SA PIP programme funded additional research to assist with residue trials. This work led to the support of EU MRLs, including the retention of Benomyl as part of the CBS control options. Of course, these types of solutions have particular relevance against the backdrop of rigorous phytosanitary measures that are far more intense compared to the trading environment in 1992 (although even then several of the current phytosanitary restrictions were already in place in some form or another).

Going forward

It would be interesting to compare citrus horticultural practices from 1992 to the current approaches used by citrus

producers today. I would be happy to receive copies of historic spray records for those that have retained them to conduct such an exercise. These can be emailed to me on ph@cga.co.za.

Besides the opportunity to reflect back on the journey of the RUR over time, one practical outcome of this exercise is that the future RURs will now follow the numbering system that was regrettably dropped back in 2003. Using the numbering system will make tracking new editions more obvious, but also provide a sense of the extended history of the RUR, giving it additional weight to engage with stakeholders and trading partners.

Finally, Vaughan Hattingh and his colleagues must be acknowledged for firstly creating the RUR as a means to provide this critical information to producers and packhouse managers, and secondly for establishing it on science-based principles that have proved to be very effective. In a recent engagement, Vaughan indicated that it was a mammoth task to compile those initial lists, simultaneously avoiding MRL non-compliance, finding available supportive data to make the first round of recommendations, and all the while trying to preserve uses of key active substances. In many respects we continue to face the same challenges and tensions today, but have in our favour an approach that has stood the test of time. 

References

- ¹ Industry Affairs Manager, Citrus Growers Association of Southern Africa
- ² Council Directives 76/895/EEC, 86/362/EEC and 86/363/EEC
- ³ 90/642/EEC effectively updated 76/895/EEC and 91/414/EEC was published as the framework for handling authorization of active substances within the European Union.
- ⁴ Guide for the control of plant pests (2002) and Guide for the control of plant diseases (2003) which had been compiled by Annette Nel, Mareli Krause and Neervana Khelawanlall.



Entomologist for Citrii Agri Services (Pty) Ltd.

CITRII Agri Services requires a second Entomologist as support to its expanding technical team.

The successful candidate will ideally initially be based in the Limpopo or Mpumalanga citrus production regions and must be willing to travel regularly to the producing areas in which CITRII Agri Services operates.

MINIMUM QUALIFICATIONS AND EXPERIENCE

- Provide professional recommendations for the effective commercial control of agricultural pests and diseases on citrus.
- Scientific qualification in Agriculture. Preference being given to a post graduate degree in entomology or plant pathology.
- Preferably 3 - 5 years of relevant work experience in Citrus or related sub-tropical fruit production.
- Valid driving licence.

Candidates meeting the above criteria, may apply in confidence enclosing a detailed CV by email to recruitment@anbinvestments.co.za

Applications close on the 31st October 2020. Only shortlisted candidates will be contacted for an interview.

If the company does not contact you on or before 20 November 2020, your application will unfortunately, have been unsuccessful. CITRII reserves the right not to make an appointment.



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