In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.
Executive Summary

This report describes the outcome of an audit carried out by the European Commission in South Africa between 13 and 24 June 2016.

This was the fifth audit by the Commission on this topic; the previous audit, which was carried out in February 2015, focused on the registration and pre-harvest controls. The current audit focused on the implementation of the official export checks required by Decision (EU) 2016/715 and the South African Citrus Black Spot Risk Management System for Citrus fruits Exported to the EU.

The audit team found that the National Plant Protection Organisation has established a robust system of official controls and other measures for the export of citrus fruit to the EU, which is in line with that required by Decision 2016/715/EU.

However, the team identified some aspects of the official field inspections and investigation of internal interceptions, which should be improved to further reduce the likelihood of interceptions of citrus black spot in 2016 onwards.

The report contains recommendations to the NPPO to address the shortcomings identified and enhance the implementation of control measures.
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>CBS</td>
<td>Citrus black spot - disease caused by the fungus <em>Phylllosticta citricarpa</em> (McAlpine) Van der Aa (formerly <em>Guignardia citricarpa</em>)</td>
</tr>
<tr>
<td>CBS-RMS</td>
<td>The South African Citrus Black Spot Risk Management System for <em>Citrus</em> fruits Exported to the EU</td>
</tr>
<tr>
<td>CGA</td>
<td>Citrus Growers Association of Southern Africa</td>
</tr>
<tr>
<td>CRI</td>
<td>Citrus Research International</td>
</tr>
<tr>
<td>DAFF</td>
<td>Department of Agriculture, Forestry and Fisheries</td>
</tr>
<tr>
<td>DAFF-DIS</td>
<td>Directorate Inspection Services of DAFF</td>
</tr>
<tr>
<td>DAFF-DPH</td>
<td>Directorate Plant Health of DAFF</td>
</tr>
<tr>
<td>EFSA</td>
<td>European Food Safety Agency</td>
</tr>
<tr>
<td>EPPO</td>
<td>European and Mediterranean Plant Protection Organisation</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>EUROPHYT</td>
<td>European Network of Plant Health Information Systems - in this report it refers to the component constituting the EU's notification system for interceptions for plant health reasons.</td>
</tr>
<tr>
<td>FCM</td>
<td>False codling moth - <em>Thaumatotibia leucotreta</em></td>
</tr>
<tr>
<td>Grapefruit</td>
<td><em>Citrus paradisi</em></td>
</tr>
<tr>
<td>Ha</td>
<td>Hectare</td>
</tr>
<tr>
<td>IPPC</td>
<td>International Plant Protection Convention</td>
</tr>
<tr>
<td>ISPM</td>
<td>International Standard for Phytosanitary Measures</td>
</tr>
<tr>
<td>Lemon</td>
<td><em>Citrus limon</em></td>
</tr>
<tr>
<td>NPPO</td>
<td>National Plant Protection Organisation</td>
</tr>
<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
</tr>
<tr>
<td>Orange/Sweet orange</td>
<td><em>Citrus sinensis</em> - includes the Navel and Valencia varieties</td>
</tr>
<tr>
<td>PhytClean</td>
<td>Central data platform – develop to permit electronic data interchange with competent authorities and replace current paper based system</td>
</tr>
<tr>
<td>PPECB</td>
<td>Perishable Products Export Control Board</td>
</tr>
<tr>
<td>PUC</td>
<td>Production Unit Code</td>
</tr>
<tr>
<td>Soft citrus/easy peelers</td>
<td>Includes Mandarin (<em>Citrus deliciosa</em>) and Clementine (<em>Citrus reticulata</em>), Satsuma (*Citrus</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Explanation</td>
</tr>
<tr>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>unshiu</td>
<td>and Naartjie (<em>Citrus nobilis</em>)</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard Operating Procedure</td>
</tr>
<tr>
<td>t</td>
<td>Metric tonne</td>
</tr>
</tbody>
</table>
1 INTRODUCTION

The audit took place in place in South Africa from 13 to 24 June 2016 as part of the European Commission's planned audit programme.

The audit team consisted of two auditors from the Commission and an expert from a European Union (EU) Member State. It was accompanied throughout the audit by a representative of the National Plant Protection Organisation (NPPO), the Inspection Service of the Department of Agriculture, Forestry and Fisheries (DAFF), and the Perishable Products Export Control Board (PPECB).

2 OBJECTIVES AND SCOPE

The objectives of the audit were to evaluate:

• The system of official plant health controls and the certification of citrus fruit for export to the EU, according to the requirements of Council Directive 2000/29/EC and Commission Implementing Decision 2014/422/EU;

• The implementation of the South African Citrus Black Spot Risk Management System for Citrus fruits exported to the EU (CBS-RMS), and any changes made since the previous Commission audit on this topic in February 2015 (Ref: DG(SANTE)2015/7633).

In terms of scope, the audit focused on the implementation of the pre-and post-harvest checks and controls carried out for *Phyllosticta citricarpa*, the causative agent of citrus black spot (CBS). The audit also included an evaluation of the situation and controls for other organisms intercepted by EU Member States, including *Thaumatotibia leucotreta*, the false codling moth.

Commission Implementing Decision (EU) 2016/715 was adopted shortly before the audit, on 11 May 2016. This repealed Decision 2014/422/EU, however the requirements relating to the import of citrus fruit from South Africa were unchanged, with the exception of the introduction of a derogation for the import of fruits of *Citrus* destined exclusively for industrial processing into juice. The scope of the audit was consequently extended to include an evaluation of the controls for the export of citrus fruits for such processing.

The following table provides details of the meetings held and sites visited in order to achieve these objectives:

<table>
<thead>
<tr>
<th>Meetings/visits</th>
<th>No.</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Competent Authorities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Central</td>
<td>1</td>
<td>NPPO – DAFF DPH and DIS, Pretoria</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>PPECB, Pretoria</td>
</tr>
<tr>
<td>Regional</td>
<td>2</td>
<td>DAFF-DIS, Durban and Port Elizabeth</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>PPECB</td>
</tr>
<tr>
<td>Local</td>
<td>4</td>
<td>DAFF-DIS Tzaneen, Hoedspruit, Kwa Zulu Natal and Sundays</td>
</tr>
<tr>
<td>Meetings/visits</td>
<td>No.</td>
<td>Comments</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>-----</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>River Valley</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plant health control sites</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production sites</td>
<td>7</td>
<td>Citrus producers: Limpopo, Mpumalanga, Kwa Zulu Natal and Eastern Cape</td>
</tr>
<tr>
<td>Pack houses</td>
<td>5</td>
<td>Limpopo, Mpumalanga, Kwa Zulu Natal and Eastern Cape</td>
</tr>
<tr>
<td>Cold Stores</td>
<td>2</td>
<td>Durban</td>
</tr>
</tbody>
</table>

### 3 LEGAL BASIS

The audit was carried out under the provisions of Articles 21 and 27a of Council Directive 2000/29/EC and in agreement with the NPPO of South Africa.

Relevant legislation and applicable standards are listed in the Annexes.

#### 3.1 RELEVANT EU LEGISLATION

Council Directive 2000/29/EC provides for protective measures against the introduction into and spread within the EU of organisms harmful to plants or plants products. These include requirements that should be met in order for fruits of *Citrus* sp. to be imported into the EU.

Commission Decision 2006/473/EU recognises certain third countries and certain areas of third countries as being free from *Xanthomonas citri* subsp. *citri*, *Cercospora angolensis* and *Phyllosticta citricarpa*. The status of these harmful organisms in South Africa is detailed in section 5.2 below.

Commission Decision (EU) 2016/715 of 11 May 2016 sets out additional measures in respect of certain fruits originating in certain countries, including South Africa, to prevent the introduction and spread of *P. citricarpa*. The official controls and checks are detailed in section 5.4 below.

References to EU legislation are to the latest amended version, where applicable. Legal references are included in in Annex 1.

#### 3.2 INTERNATIONAL STANDARDS

Article X (4) of the International Plant Protection Convention (IPPC) establishes that contracting parties should take into account, as appropriate, international standards when undertaking activities related to the Convention. The International Standards for Phytosanitary Measures (ISPM) issued by the IPPC thus provide a basis, in addition to any specific EU import requirements, for evaluating official export controls carried out by contracting parties. South Africa is a contracting party to the IPPC.
The full texts of adopted ISPMs are published on the website of the IPPC: https://www.ippc.int/core-activities/standards-setting/ispm. The ISPMs that were of particular relevance to this audit are listed in Annex 2.

4 BACKGROUND

This was the fifth audit carried out by DG Health and Food Safety to South Africa concerning the export controls for fruits of Citrus sp.. The previous audit was carried out between 24 February and 6 March 2015 (Ref: DG(SANTE)2015/7633).

The reports of all previous audits are available on the Health and Food Safety DG website: http://ec.europa.eu/food/audits_analysis/index_en.htm.

4.1 Phyllosticta citricarpa

P. citricarpa is the causative agent of citrus black spot (CBS). The fungus is not present in the EU and is listed in Annex I Part A Section I to Directive 2000/29/EC; and as such, its introduction and spread within the EU is banned. The European Food Safety Authority (EFSA) published a Pest Risk Analysis and Opinion of the Plant Health Panel on P. citricarpa, which includes detailed information on the organism. The full text of the opinion is available on EFSA's website: http://www.efsa.europa.eu/en/efsajournal/pub/3557.htm.

EFSA published an evaluation of new scientific information on P. citricarpa in relation to that Opinion on 17 June 20161.

4.2 Thaumatotibia leucotreta

The False codling moth, Thaumatotibia leucotreta (FCM) is a tropical/sub-tropical moth that is a significant pest of fruit trees and field crops in sub-Saharan Africa. T. leucotreta is not listed as a harmful organism in Directive 2000/29/EC however, it has been intercepted by EU Member States on various fruits and vegetables, including certain citrus fruits from South Africa (see section 4.3. below).

The European and Mediterranean Plant Protection Organisation (EPPO) has carried out a Pest Risk Analysis for T. leucotreta2, which concluded that the introduction of the pest into the EU is moderately likely, with a medium certainty. T. leucotreta was subsequently included in its A2 list of pests recommended for regulation as quarantine pests in 2013, and, following interceptions of the pest in consignments of fruit and vegetables originating in Africa, has been proposed for inclusion in Directive 2000/29/EC, as a harmful organism.

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2 https://www.eppo.int/QUARANTINE/Pest_Risk_Analysis/PRAdocs_insects/13–18742_PRA_report_Thaumatotibia_leucotreta.pdf
4.3 Notifications of interception

This audit was carried out in light of the ongoing interceptions of *P. citricarpa* in consignments of citrus fruit exported from South Africa to the EU. The previous audits were carried out for the same reason.

As detailed in Table 1 below, EU Member States notified a total of 43 interceptions of harmful organisms in consignments of citrus fruit exported from South Africa to the EU in 2015, in EUROPHYT, the EU's notification system for plant health. 15 of the interceptions concerned *P. citricarpa*, which represents an approximate 50% reduction, compared to the average number of interceptions of this harmful organism notified in the four years between 2011 and 2014.

**Table 1: Notifications of interception and non-compliance by EU Member States concerning fruits of Citrus spp. exported from South Africa (Source: EUROPHYT)**

<table>
<thead>
<tr>
<th></th>
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<th></th>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Presence of harmful organism</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>46</td>
<td>35</td>
<td>40</td>
<td>52</td>
<td>43</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(12′)</td>
<td></td>
</tr>
<tr>
<td>• <em>P. citricarpa</em></td>
<td>38</td>
<td>28</td>
<td>35</td>
<td>28</td>
<td>15</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(6′)</td>
<td></td>
</tr>
<tr>
<td>• <em>T. leucotreta</em></td>
<td>7</td>
<td>3</td>
<td>1</td>
<td>20</td>
<td>16</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(4′)</td>
<td></td>
</tr>
<tr>
<td>• Non-European Tephritidae</td>
<td>1</td>
<td>4</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Other reasons, including documentary reasons.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>10</td>
<td>25</td>
<td>66</td>
<td>19</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(21′)</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>51</td>
<td>45</td>
<td>65</td>
<td>118</td>
<td>62</td>
<td>13</td>
</tr>
</tbody>
</table>

* - To 31/7/2016
+ - 1/1/2015 to 31/7/2015

In 2016, up to 31 July, no interceptions of *P. citricarpa* and only 2 interceptions of FCM had been notified by EU Member States. Considering that black spots caused by *P. citricarpa* develop late season, data for the same period in 2015 is included in Table 1 for comparative purposes. This indicates that there has been a further significant reduction in interceptions of all harmful organisms compared to the same period in 2015.

4.4 Production and Trade

4.4.1 Production of citrus fruits

According to data provided by the Citrus Growers Association (CGA), South Africa is the 11th largest producer of fresh citrus worldwide, with a total annual production in 2015 of approximately 2.4 million tonnes.

The total areas planted with citrus in South Africa increased in 2015 by approximately 5%. As detailed in table 2 below, the most significant increases have been in soft citrus and lemons, for which the EU is a major market.

Table 2: Total area planted by citrus variety, 2014 to 2016 (source: CGA)

<table>
<thead>
<tr>
<th>Type</th>
<th>2014 (Ha)</th>
<th>2015 (Ha)</th>
<th>2016 (Ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oranges</td>
<td>41 933</td>
<td>39 983</td>
<td>41 184</td>
</tr>
<tr>
<td>Grapefruit</td>
<td>8 865</td>
<td>8 361</td>
<td>7 181</td>
</tr>
<tr>
<td>Soft Citrus</td>
<td>6 401</td>
<td>7 668</td>
<td>9 254</td>
</tr>
<tr>
<td>Lemons</td>
<td>5 904</td>
<td>6 641</td>
<td>7 966</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>63 103</strong></td>
<td><strong>62 653</strong></td>
<td><strong>65 585</strong></td>
</tr>
</tbody>
</table>

The NPPO informed the audit team that there are 1 299 production units with 18 301 orchards situated outside of the pest free areas for *P. citricarpa* (see section 5.2. below). There are a further 553 production units and 4 365 orchards in the pest free areas.

According to producers met during the audit, it is anticipated that there will be a significant reduction in yields of oranges and grapefruit in 2016 due to the ongoing drought and severe hail damage in key production areas.

4.4.2 Exports of citrus to the EU

South Africa is the second largest exporter of fresh citrus worldwide, with total exports in 2015 of approximately 1.7 million tonnes. As detailed in Table 3 below, the EU accounts for a significant proportion of total exports for all types.

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3 Key Industry Statistics for Citrus Growers 2016; Citrus Growers Association of South Africa.
Table 3: Exports of citrus fruit to the EU, from 2014 to 2016* (source, PPECB)

<table>
<thead>
<tr>
<th>Type</th>
<th>2014 (t)</th>
<th>2015 (t)</th>
<th>2016* (t)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oranges</td>
<td>415 200</td>
<td>462 682</td>
<td>26 224</td>
</tr>
<tr>
<td>Lemons</td>
<td>40 856</td>
<td>47 150</td>
<td>18 508</td>
</tr>
<tr>
<td>Soft Citrus</td>
<td>85 384</td>
<td>99 496</td>
<td>39 107</td>
</tr>
<tr>
<td>Grapefruit</td>
<td>96 467</td>
<td>100 386</td>
<td>28 750</td>
</tr>
<tr>
<td>Total</td>
<td>637 907</td>
<td>709 714</td>
<td>112 589</td>
</tr>
</tbody>
</table>

* - to 31 May 2016

The main ports used for the export of citrus are Durban (54%), Cape Town (19%), Ngqura (16%) and Port Elizabeth (10%). The NPPO informed the audit team, that no exports to the EU have taken place via Maputo (Mozambique) since 2014.

5 FINDINGS AND CONCLUSIONS

5.1 ORGANISATIONAL ASPECTS OF PLANT HEALTH CONTROLS

Legal requirements

Decision (EU) 2016/715 includes measures in respect of certain fruits originating in South Africa, to prevent the introduction and spread within the Union of *P. citricarpa*.

Directive 2000/29/EC establishes requirements in order for a measure or statement to be considered 'official'.

ISPM 7 contains requirements and describes components of a phytosanitary certification system to be established by national plant protection organizations (NPPOs).

ISPM 23 provides guidelines for inspection.

Findings

5.1.1 National Plant Protection Organisation

1. The structure of the NPPO was described in detail in the previous audit reports. The NPPO informed the audit team that there have been no changes to the organisation since the previous audit.

2. In summary, the NPPO for South Africa comprises of the following three Directorates, all of which are within the Agricultural Production, Health and Food Safety Branch of the Department of Agriculture, Forestry and Fisheries (DAFF):
• Directorate Plant Health (DAFF-DPH), acts as the policy unit for plant health matters;
• Directorate Inspection Services (DAFF-DIS), is the official operational and inspection service, and performs the official inspections for citrus fruit exported to the EU;
• Directorate Food Import and Export Standards. This Directorate is responsible for advocacy and promotional issues.

3. Further information on the NPPO is available on DAFF’s website\(^4\).

5.1.2 Other relevant competent authorities

4. The Perishable Products Export Control Board (PPECB) is a 'national public entity', which performs cold chain services, including issuing a certificate of origin and quality certificate for fresh fruit exported to the EU (and elsewhere). It has been formally mandated by DAFF to perform official inspections of citrus fruit exported to the EU, in pack-houses and cold stores.

5. The PPECB informed the audit team that there have been no changes to the PPECB since the previous audit. Further information on the PPECB is available on their website: www.ppecb.com.

5.1.3 Legislation

6. The national legislation of relevance to the production and export of fruits of *Citrus* sp. to the EU, including the recognition and protection of pest free areas for *P. citricarpa* was detailed in the previous report.

7. The NPPO informed the audit team that there have been no changes since the previous audit.

5.1.4 Work planning and resources

5.1.4.1 DAFF-DIS

8. The previous audit identified potential issues relating to the availability of resources and the planning of inspections. The NPPO stated that, following that audit, there had been eight new appointments to the Inspection Service. In addition, seven existing officials had been redeployed to transfer skills, knowledge and strengthen human capacity in the main citrus producing areas.

9. The NPPO informed the audit team that the action proposed to address recommendation (1) of the previous report\(^5\) had not been implemented in its entirety at the time of the current audit. Specifically, the changes proposed to the template for recording inspections (action (2) in the action plan) had not been implemented, and the


development of the Citrus Inspection Planning Tool (action (3.3) in the action plan) had not been completed at the time of the audit. The NPPO informed the audit team that they had initiated a trial in the Eastern Cape to record the inspection times and area inspected, to examine the feasibility of establishing standard average inspection times for planning purposes. The focus of the trial is the Sundays River Valley area, which is part of the Eastern Cape and includes a large number of production units and orchards that export to the EU.

10. The audit team examined the records of the inspection times and areas inspected, and noted that these varied significantly, however at one extreme, a 6Ha orchard was recorded as being inspected in 20 minutes, which would be insufficient time to allow an inspection in line with the NPPO's Standard Operating Procedure for orchard inspections.

11. The audit team also examined the planning of inspections relating to Kwa Zulu Natal and Limpopo Province. The inspections were planned based on the applications submitted by producers, which include an anticipated harvest date. However, the basis for the allocation and planning did not take account of the areas to be inspected, and in the case of Limpopo Province it was not clear how, or when, the allocated inspections could be completed before harvesting. The DAFF-DIS inspectors and producers met by the team stated however, that the fields would not be harvested before being inspected, as in such cases the fruit would not be eligible for export to the EU.

12. However, in Kwa Zulu Natal, the investigation reports following a finding of CBS by the PPECB in a pack-house indicated that the three orchards involved had been inspected on the same day as the finding. Considering that harvesting is normally carried out in the morning, to enable the fruit to be processed and packed the same day, the inspection of the three orchards involved, would most probably have been compromised. Although the investigation carried out after the finding did not identify any problems with the pesticide treatment regime, the investigation did not consider whether the field check was appropriately carried out or not.

13. As noted in the previous audit, there was no direct evidence that the shortage of time for inspections had resulted in inadequate checks being carried out. The NPPO informed the audit team that, despite the concerns raised regarding the time available for inspections, that the checks at places of production (see section 5.4.1 below) had identified the presence of CBS in 98 orchards up to the time of the audit in 2016.

5.1.4.2 PPECB

14. The PPECB informed the audit team that, since the previous audit, an initiative to recruit new graduates had been started. 38 new permanent staff had been recruited since the previous audit to implement the CBS-RMS. The PPECB has also introduced a Transformation and Development Programme, which provides internships and seasonal working. After five years participation in the programme, the interns and seasonal workers are eligible to be offered permanent posts with the PPECB.
15. The PPECB also highlighted the continued developments in the use of computer systems, in particular mobile computing, that had reduced the ‘paper’ based administrative burden on inspectors. Since the previous audit, the citrus industry has developed the ‘PhytClean’ system for the recording and managing documents for the CBS-RMS. It was noted that the PPECB use these records, which has reduced the amount of duplication between systems since the previous audit.

5.1.5 Guidelines and training

16. The DAFF-DIS informed the audit team that the system of induction training for newcomers and the provision of refresher training prior to the start of the export season had not changed since the previous audit.

17. DAFF-DIS Inspectors and the PPECB have been provided with Standard Operating Procedures and Work Instructions (see section 5.4.1 below), as well as a range of relevant technical literature. All of the DAFF-DIS inspectors met by the audit team had access to the current version of these documents either in hard-copy or electronically. Following the introduction of mobile technology, all PPECB inspectors have access to only the current version using their mobile computers.

18. The NPPO informed the audit team that, from 2015, all PPECB inspectors carrying out checks of citrus fruit for export to the EU must undergo training by DAFF before the start of the export season, to ensure that PPECB and DAFF-DIS inspectors perform checks to the same standard.

5.1.6 Laboratories and technical support

19. As detailed in the previous report, four laboratories have been authorised by DAFF to perform analysis and official confirmation tests for *P. citricarpa*. The DAFF Plant Health Diagnostic Services laboratory acts as the national reference laboratory and is responsible for accrediting and supervising the other authorised laboratories.

20. The NPPO reported that one additional private laboratory had been authorised to perform analysis of fruit suspected infected with *P. citricarpa* since the previous audit. One previously authorised laboratory had been suspended in 2016 as a result of an official audit carried out by DAFF.

5.1.7 Communication with stakeholders

21. The report of the previous audit provides a detailed description of the NPPO communication with individual stakeholders and stakeholder organisations. There have been no changes since then.

22. There is a high level of awareness of relevant EU requirements and harmful organisms and cooperation with stakeholder organisations, and frequent dialogue and exchange of information, including an annual review of the outcome of the season and to prepare for the next.
Conclusions on organisational aspects of plant health controls

23. The organisation of the plant health controls for the export of citrus to the EU is largely unchanged since the previous audit. Official checks are only carried out by either the NPPO or its delegated body, in line with EU import requirements.

24. The NPPO has good communication and cooperation with all role players involved in the export of citrus to the EU and there is a high level of awareness of relevant EU requirements and harmful organisms.

25. There has been some additional staff recruited by the NPPO for performing the official checks. The inspection activities are planned, and the inspectors have been trained and provided with guidelines for performing the checks. However, it is still not clear that the system for planning the official checks takes account of the practical considerations or operational criteria. In particular it is not always ensured that the resources are adequate to consistently apply the specified sampling method for the additional checks. Section 2.3.1 of ISPM 23 requires controls to be consistently applied.

5.2 PHYTOSANITARY STATUS

Legal requirements

Decision 2006/473/EC

Decision (EU) 2016/715.

Part A of Annexes I and II to Directive 2000/29/EC.

ISPM 8.

Findings

5.2.1 Phyllosticta citricarpa

26. The NPPO stated that there has been no change in the status of *P. citricarpa* in South Africa since the previous audit. As detailed in the previous report, there are legal measures in place aimed at protecting the pest free areas recognised by Decision 2006/473/EC, including restrictions on the movement of citrus propagation material within South Africa, published under the Agricultural Pests Act, 1983 (Act No. 36 of 1983), as Control Measures R. 110 of 27 January 1984: Restriction on the movement of citrus propagating material within South Africa.

27. The NPPO conducts surveys for CBS in the pest free areas to ensure their continued pest freedom. Such maintenance surveys were carried out in the Western Cape in Mossel Bay, George, Knysna, Vredendal and Van Rhynsdorp. A further survey is planned in the same areas in 2017. A survey will also be carried out at the same time in the Gordonia
region of the Northern Cape, which was recently recognised by the EU as a pest free area for CBS.

28. The NPPO also informed the team that an audit had been carried out in a proposed Area of Low Pest Prevalence in Limpopo Province, on 23-25 November 2015. Eighteen production units consisting of 144 orchards or block numbers were tested and found free from *P. citricarpa*.

29. The distribution of *P. citricarpa* in South Africa, and its absence from those areas recognised as being free of the disease by Decision 2006/473/EC has been confirmed by official surveys in line with ISPM 8. Appropriate measures are in place to maintain the pest free status of these areas in line with the same Standard.

5.2.2 *Thaumatotibia leucotreta*

30. The NPPO stated that there has been no change in the status and distribution of *T. leucotreta* since the previous audit, however stakeholder research organisations, industry and DAFF have established a False Codling Moth Task Team to focus on how to improve controls for FCM and prevent further interceptions of the pest in South African produce, including citrus fruits. The Task Force is considering the option of additional official inspections of fruit prior to export, as well as improving producer level controls. DAFF informed the audit team that a reminder had been sent to all businesses registered in the CBS-RMS to remind them of the EU’s concerns regarding FCM. The team noted that there was a high level of awareness of the pest amongst producers and a greater emphasis on the regular (daily or weekly) collection and destruction of fallen fruit in orchards.

31. The NPPO also informed the team that the Sterile Insect Technique which has been successful in minimising the presence of *T. leucotreta* in the Western Cape citrus producing areas is being rolled out to the Eastern Cape citrus producing areas from 2016 onwards. There was also an increased use of traps in orchards.

32. In January 2016, Citrus Research International (CRI) issued updated guidelines for producers on the management of *T. leucotreta*, which includes cultural techniques and integrated pest management, including the use of granuloviruses, mating disruptants and Sterile Insect Technique.
Conclusions on phytosanitary status

33. The distribution of *P. citricarpa* in South Africa has been reliably determined by the NPPO based on official surveys and other controls by trained specialists, in line with relevant International Standards.

34. *Thaumatotibia leucotreta* is widespread in citrus production in South Africa, and a variety of control measures have been developed, and applied for its control, in line with guidelines issued by the CRI. These, combined with the official checks (see section 5.4. below) should significantly reduce the risk of presence of the pest in citrus fruits exported to the EU.

5.3 EXPORT PROCEDURES

Legal requirements

Directive 2000/29/EC establishes measures for fruits of *Citrus* originating from areas free from *P. citricarpa* (Pest Free Areas).

Decision 2006/473/EU recognises pest free areas.

Decision (EU) 2016/715.

ISPM 7.

Findings

5.3.1 Citrus black spot Risk Management Scheme

35. The CBS-RMS which has been developed by DAFF, in consultation with the PPECB and stakeholders, specifies the roles and responsibilities of various stakeholders and the procedures to be followed for the export of citrus fruits to the EU. Only fruit that is produced, handled and inspected in accordance with the scheme may be exported to the EU.

36. As detailed in the previous report, the CBS-RMS has been extensively revised since its launch in 2009, to take account of experience gained during each export season and the outcome of investigations carried out following findings of non-compliance or EU interceptions of *P. citricarpa*, as well as any changes to EU import requirements.

37. The CBS-RMS includes provisions for:
   - Registration;
   - Application of pesticide treatments;
   - Verification checks;
   - Field inspections;
   - Sampling and testing for latent infection;
   - Checks in the pack-house;
38. The previous audit concluded that the export procedures and system of official checks established by CBS-RMS was fully in line with EU requirements for the import of citrus fruits from South Africa to the EU.

39. The CBS-RMS is reviewed annually to take account of experience from the each export season. The version in force at the time of the audit was issued in May 2016. In practice, there were only limited changes made since the previous version, which was described in the previous report. These changes relate to the sampling of Valencia oranges for latent infection with *P. citricarpa* and the sampling and inspection regime at pack-houses (see sections 5.4.2 and 5.4.3 below).

40. The NPPO informed the audit team that there is no separate production of citrus fruits destined exclusively for industrial processing into juice in the EU, and at the time of the audit, the CBS-RMS did not include separate provisions for the export of such fruit.

41. The NPPO stated that all fruits of *Citrus* exported to the EU, including those destined exclusively for industrial processing into juice, must comply fully with the CBS-RMS and thereby with the provisions of Article 5 of Decision (EU) 2016/715.

### 5.3.2 Registration and traceability

42. The system of registration of operators involved in the production and handling of citrus fruits for export to the EU, including production units, pack-houses, cold stores and exporters and handling agents was detailed in the previous report. The previous audit evaluated the performance and impact of this check, and concluded that the procedures were fully in line with ISPM 7 and the EU import requirements for citrus fruit originating in South Africa. The NPPO informed the audit team that there have been no changes to the system since that time.

43. As a condition of registration, all operators must have at least one member of staff who has been trained on CBS and CBS-RMS by DAFF. Producers are also required to apply effective control measures against CBS and have a record keeping system in place.

44. DAFF-DIS carry out a verification check in January and February each year to confirm that all of the conditions for registration have been complied with before the application for registration is approved.

45. It was confirmed during the current audit that the system of registration and labelling of consignments is fully in line with the requirements of Article 7 of Decision (EU) 2016/715.

### 5.3.3 Export of fruits destined exclusively for industrial processing into juice

46. The NPPO informed the audit team that the labelling requirements for fruit for juicing, in Article 9 of Decision (EU) 2016/715, that each carton must be labelled indicating that
the fruit was destined exclusively for industrial processing into juice, was not practical, as this would mean individually labelling 1 600 cartons in each container of exported to the EU. As a result, the industry was exporting such fruit in bulk bins, two per pallet, each of which is labelled in accordance with the Decision, with an additional bar-code label containing information on the production unit and pack-house, to ensure traceability.

47. The audit team observed the packing and inspection of citrus fruit being exported to the EU for juicing and noted that all bins were marked with appropriate labels in line with Article 9 of Decision (EU) 2016/715.

**Conclusions on export procedures**

48. The NPPO has established a detailed system of procedures that have to be followed in order for citrus fruit to be exported to the EU, which is fully in line with ISPM 7 and the EU import requirements for citrus fruit originating in South Africa.

## 5.4 EXPORT INSPECTIONS

### Legal requirements

Section I of Part A of Annex IV to Directive 2000/29/EC.

Decision 2016/715/EU sets out measures, including official checks, in respect of certain fruits originating in certain non-EU countries.

ISPM 12, ISPM 23 and ISPM 31.

### Findings

49. The system of checks required for the export of citrus fruit to the EU is established in the CBS-RMS. The NPPO stated that there has been no change since the previous audit. The previous audit focussed on the registration, treatment regime and verification checks to confirm compliance with the CBS-RMS and Decision 2014/422/EU. The current audit focussed on the subsequent checks.

50. The NPPO informed the audit team that there is considerable interest in the export of fruit for industrial processing, and the possibility of using a derogation from the standard requirements. As detailed in section 5.3 above, there are no separate procedures or export checks for fruit destined exclusively for industrial processing into juice; all such fruit is produced and checked in accordance with the CBS-RMS.

#### 5.4.1 Field of production

51. Following successful completion of the verification check detailed in section 5.3.2. above, and for Valencia oranges, the test for latent infection (see section 5.4.3 below),
DAFF-DIS carries out an inspection of each registered orchard to confirm the absence of signs of *P. citricarpa*.

52. Producers must submit a request for inspection approximately four weeks in advance of the anticipated harvest, which allows the DAFF-DIS a two-week window for performing the checks. The fruit should be at least stage 6 on the external colour scale in the OECD International Standard for Fruit and Vegetables: Citrus Fruits.\(^6\)

53. DAFF-DIS has issued a specific Standard Operating Procedure (SOP) and Work Instruction for inspecting citrus orchards, which provide guidance for performing the necessary inspections. These include details of the inspection and sampling equipment that should be available to the inspectors as well as the forms for recording the outcome of inspections and, if necessary, for submitting samples for laboratory analysis.

54. The audit team noted that the SOP is labelled as a draft, which has not been signed, however the NPPO indicated that it is fully applicable, pending final approval.

55. The Work Instruction specifies that inspectors should focus their checks on old or neglected parts of the orchard, as well as all trees in the north-western part of the orchards (the part most exposed to the sun), as these areas are considered to be most at risk of CBS. Inspectors are required to check the remainder of each orchard following a zig-zag pattern, focusing their inspections on the sunny side of trees and fallen leaves and fruits. If any symptoms of CBS are found, then the Work Instruction specifies that samples should be taken and sent to the DAFF Diagnostic Services Laboratory in Stellenbosch for confirmation. All suspected findings of CBS must be reported immediately to the regional coordinator. The action taken following a confirmed finding of CBS during the inspections is detailed in section 5.6.1 below.

56. The audit team observed field checks being carried out in Limpopo and Mpumalanga Provinces and the Eastern Cape. All of the DAFF-DIS inspectors met by the team stated that they had been specifically trained to perform checks for CBS. The audit team noted that the inspectors followed the procedures established in the SOP and Work Instruction for performing checks, however, it was noted that not all inspectors had appropriate sampling equipment with them when performing the checks, and that the quality of the checks of trees other than those recognised as high-risk in the SOP, was variable, and in some cases, not appropriate to exclude the possible presence of CBS on these trees, in line with Article 5 (b) of Decision (EU) 2016/715.

57. The DAFF-DIS and producers of lemons in Eastern Cape informed the audit team that lemons may have three or more 'flushes' each year, which means that flowers may be present on trees throughout the year. This results in mature fruit being present at a time when it would be necessary for the trees to be treated to prevent infection with *P. citricarpa*. Due to the minimum harvest intervals required following treatment with the

specified plant protection products, it would not be possible to use any fruit present on
the trees at the time of treatment, for human consumption.

58. DAFF and the producers stated that the possibility of multiple flushes, or continuous
flowering is not provided for in Decision (EU) 2016/715. In order to ensure that
appropriate treatments and inspections may be carried out in line with the Decision, all
fruit present on the trees is removed in February each year, and sold on the local market.
The orchards, and harvested fruit, are not subject to inspection for the presence of CBS
prior to this harvest, however, the trees are then treated as if they have one growing
season, and are subjected to the pesticide treatments and field checks specified by the
CBS-RMS and Article 5 (a) and (b) of Decision (EU) 2016/715.

5.4.2 Pack house

59. The PPECB is responsible for performing the inspections and sampling of citrus fruits in
pack-houses. As detailed in the previous audit report, all consignments of citrus fruit
intended for export to the EU are inspected immediately after processing and packing.
The checks concern both plant health and fruit quality. 2% of each consignment is
inspected.

60. At the time of the previous audit, the CBS-RMS had been amended to include the
requirement, introduced by Decision 2014/422/EC, that a sample of fruit from each
batch be inspected along the packing line.

61. The PPECB informed the audit team that the system of checks in the pack-houses had
remained the same, however, the possibility for the pack-house to take a sample from
each batch of fruit on arrival, for inspection by the PPECB had been introduced, to
reduce the burden on the PPECB inspectors. The pack-house must nominate a
responsible person, who is trained, assessed and certified by the PPECB to take a sample
of 600 fruit for each 30 tonne batch on arrival at the pack-house.

62. The sample is required to be taken at the time of dumping at the intake, focussing on fruit
showing possible symptom of CBS. The samples are taken to the PPECB inspection
facility within the pack-house and are checked prior to processing and packing of the lot.

63. The audit team observed the sampling of fruit at intake and noted that fruit with
blemishes and marks were targeted and the samples were subsequently recorded and
appropriately inspected by the PPECB. The NPPO informed the audit team that 28% of
internal findings of CBS are in the initial 600 fruit sample.

64. Additional checks were carried out by the PPECB along the line, at regular time
intervals. The inspectors met by the audit team explained that the rate of flow of the fruit
on the line was used to calculate the duration of the inspection in order to ensure that a
minimum of 600 fruits is inspected for each batch of 30 tonnes. The PPECB also check
2% of the fruit in each packed consignment intended for export to the EU.
65. The checks carried out in the packhouse are in line with the requirements of Article 5 (c) of Decision (EU) 2016/715.

5.4.3 **Sampling for latent infection**

66. The procedures for sampling and testing of Valencia oranges for latent infection by *P. citricarpa*, was detailed in the previous report. It is based on a standard method developed by CRI, which requires that 110 fruit per orchard (up to 5ha), and a further 22 fruit for each additional hectare, are sampled eight or more weeks prior to harvesting. The samples are placed in 25kg net bags and then dipped for 5 minutes in Ethephon at a rate of 1900μg/ml water and incubated afterwards for 14 days under dry conditions in ambient conditions, between 20°C to 27°C. The samples are then inspected by the PPECB, for signs of CBS.

67. DAFF-DIS informed the audit team, that in light of experience gained since 2014, in particular with collecting samples with the logistical assistance of producers, the possibility for producers to collect their own samples had been introduced in 2016. This was partially with the aim of reducing the burdens on DAFF-DIS inspectors at a peak-time for performing field checks.

68. Producers must be specifically trained, assessed and authorised by DAFF-DIS to perform the sampling and Ethephon treatments. Producers are issued with uniquely numbered and tamper proof seals to seal each 25kg bag. The time of treatment must be recorded for each sample in PhytClean. This is checked, together with the samples, by the PPECB.

69. DAFF-DIS informed the audit team that, to incentivise compliance with the sampling and testing protocol, in the event that CBS is found as a result of the test for latent infection, exports would not be permitted but that it would not be counted as a ‘hit’ (see section 5.6.1 below).

70. The producers met by the audit team had been trained and authorised to take the necessary samples, and all had appropriate facilities for treating and storing the samples. The producers indicated that they preferred to take the samples 30 days before harvest, to improve the sensitivity of the test.

71. The checks for latent infection are in line with Article 5(d) of Decision (EU) 2016/715.

72. Table 6 below provides details of the results of Ethephon testing carried out in 2014-2015.
Table 6: Results of Ethephon testing carried out in 2015 and 2015

<table>
<thead>
<tr>
<th></th>
<th>PUCs</th>
<th>Orchards</th>
<th>PUCs</th>
<th>Orchards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Negative [no CBS]</td>
<td>525</td>
<td>845</td>
<td>4055</td>
<td>6173</td>
</tr>
<tr>
<td>Positive [CBS found]</td>
<td>123</td>
<td>10</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

73. The NPPO informed the audit team that in 2016, up to the date of the audit, 11 orchards had tested positive for CBS.

5.4.4 Point of export

74. DAFF-DIS informed the audit team that there had been no changes to the protocol for age-related checks, which was introduced in 2014. DAFF-DIS must re-inspect all consignments that have not entered cool chain facilities within six days of the PPECB inspection in the pack-house. A further re-inspection must be carried out for all consignments that have not been exported within 18 days of the PPECB inspection. No consignments may be exported to the EU, 28 days after the PPECB inspection.

75. The audit team visited two fruit terminals in Durban, which handle and store citrus fruits intended for export to the EU. Both facilities had computerised systems to track and control the movement of individual pallets of fruit, which included automatic warnings in advance of the need for an age-related check, to assist in stock control, and an automatic block on movements, once a check is required.

Conclusions on export inspections

76. The NPPO has established a comprehensive system of official inspections for the export of citrus fruit to the EU. All citrus fruits exported to the EU, including that destined exclusively for industrial processing into juice, is produced in compliance with the CBS-RMS and Decision (EU) 2016/715.

77. The implementation of the sampling on arrival of fruit at the pack-house, and sampling of Valencia oranges for latent infection, has been revised and now may be carried out by specifically trained and authorised stakeholders. The samples are subjected to official checks, in line with Decision (EU) 2016/715.

78. The official checks carried out in places of production focus on those plants at high-risk of infection with *P. citricarpa* and less so, on other plants in the orchards. However, the additional sampling and checks of the harvested fruit immediately on arrival at the pack-house is appropriate to ensure the detection of any symptoms of *P. citricarpa* in the specified fruit in line with Article 5(b) of Decision (EU).
5.5 PhytoSanitary Certificates

Legal requirements

Article 2(1)(i) of Directive 2000/29/EC.
Paragraphs 3 and 4 of Article 13a of Directive 2000/29/EC.
Decision (EU) 2016/715.
ISPM 12.

Findings

79. PhytoSanitary certificates are only issued by DAFF-DIS, and only for fruit originating in orchards that have successfully passed all of the checks detailed in section 5.4 above.

80. As detailed in the previous report, DAFF-DIS issued revised guidelines on the use of additional declarations on phytoSanitary certificates following the introduction of Decision 2014/422/EU. It was concluded at that time that the procedures for the issue of phytoSanitary certificates, including the use of additional declarations, are fully in line with ISPM 12.

81. The audit team visited DAFF offices in Port Elizabeth and Durban that are responsible for issuing phytoSanitary certificates. It was noted that officers issuing certificates all had the current Alert and Black Lists of orchards and PUCs excluded from exporting to the EU (see section 5.6 below), which are sent directly by email to all DAFF-DIS and PPECB officers daily at 3.30pm.

82. The procedures for the issue of phytoSanitary certificates, including the use of additional declarations, are fully in line with ISPM 12, and for citrus fruit exported to the EU, Articles 5 and 9 of Decision (EU) 2016/715.

83. DAFF-DIS informed the audit team that since the previous audit, an office for the issue of phytoSanitary certificates, had been opened in the Sundays River Valley, close to Port Elizabeth, to help reduce the burden on the Port Elizabeth office at peak times.

84. As detailed in Table 1 above, there was a significant reduction in the number of documentary non-compliances notified by Member States in 2015. 10 such non-compliances had been notified in 2016 up to 31 July.

85. The audit team noted that the majority of notifications in 2016 related to the additional declarations used during the period between the adoption of Decision (EU) 2016/715 on 22 May 2016, and the date at which the Decision took effect, 1 June 2016. During this period the NPPO had issued phytoSanitary certificates with the additional declaration required by Decision 2014/422/EU, however this was not accepted by certain Member States.
Conclusions on phytosanitary certificates

86. The procedures for the issue of phytosanitary certificates for the export of citrus fruit to the EU, ensure that the certificates are in line with Decision (EU) 2016/715.

5.6 Action taken in response to non-compliances and EU notifications of interception

Legal requirements

ISPM 7 and ISPM 23.

Findings

87. The general procedures taken following a finding of non-compliance or an EU interception, were detailed in the previous audit report. That audit concluded that the procedures were in line with ISPM 7. The NPPO informed the audit team that there has been no change to the procedures since then.

5.6.1 Non-compliances

88. Any findings of CBS or other non-compliance during any of the official checks detailed in section 5.4 above, constitutes a 'hit', and the orchard is added to the so-called CBS EU Alert List. This results in an immediate suspension of export to the EU from the relevant orchard(s). If there are two hits from the same PUC for the same citrus type, the two implicated orchards will be disqualified from exporting to the EU. If there is a third hit for the same PUC, then the whole PUC is disqualified for export to the EU for the remainder of the season, as well as the complete consecutive export season.

89. DAFF-DIS carries out an investigation following all findings of CBS to determine the cause of the non-compliance. Where the reason is found to be deficient or incomplete pesticide treatments, the whole of the PUC concerned is suspended from exporting to the EU for the remainder of the current season.

90. Producers may apply for re-instatement of the orchard or PUC, after two export seasons, in line with the procedure defined in the CBS-RMS, as follows:

- The application must include details of the risk management programme and any action taken to prevent a recurrence of the interception;
- On receipt of the application, DAFF assigns an officer with appropriate specialist knowledge and experience with CBS and the CBS-RMS to evaluate the application, in consultation with experts from CRI;
- The evaluation includes an audit of the systems in place and an inspection of the orchards involved. If the evaluator determines that the reason for the interception was deficient or incomplete orchard treatments, then the PUC shall not be re-instated, and will remain blacklisted. In other circumstances, the evaluator may recommend re-instatement subject, if necessary, to additional conditions.
91. The number of PUCs and orchards included on the Alert Lists in 2015 and 2016 is detailed in table 7 below. There was a considerable increase in the totals for both in May 2016, compared to the previous season. The NPPO indicated that this was due to positive findings during orchard inspections.

Table 7: PUCs and orchards included in the Alert lists for 2015 and 2016

<table>
<thead>
<tr>
<th>Month</th>
<th>Alert list 2015</th>
<th>Alert list 2016*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PUC</td>
<td>Orchards</td>
</tr>
<tr>
<td>March</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>April</td>
<td>11</td>
<td>13</td>
</tr>
<tr>
<td>May</td>
<td>24</td>
<td>28</td>
</tr>
<tr>
<td>June</td>
<td>15</td>
<td>16</td>
</tr>
<tr>
<td>July</td>
<td>29</td>
<td>34</td>
</tr>
<tr>
<td>August</td>
<td>29</td>
<td>30</td>
</tr>
<tr>
<td>September</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>125</strong></td>
<td><strong>139</strong></td>
</tr>
</tbody>
</table>

* - to 31 May 2016

92. The possibility of voluntary withdrawal of PUCs or orchards was introduced in 2014 at the same time as increased sanctions for non-compliance. The number of PUCs and orchards voluntarily withdrawn in 2015 and 2016 is detailed in table 8 below.

Table 8: Number of PUCs and orchards voluntarily withdrawn in 2015 and 2016

<table>
<thead>
<tr>
<th>Voluntary withdrawal</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>2015</td>
</tr>
<tr>
<td>PUC</td>
</tr>
<tr>
<td>407</td>
</tr>
</tbody>
</table>

* - to 31 May 2016

93. The data in table 8 indicates that there was a significant decrease in the number of PUCs and orchards that were voluntarily withdrawn in 2016 compared to the previous season. These withdrawals may be for a variety of reasons including changes in the intended export market for commercial reasons.

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7 In their comments on the draft audit report, the competent authority noted that: “Reinstatement will be accommodated only after suspension from the two (2) export seasons (season of interception and a full consecutive export season) and when the appropriate measures have been taken by the producer or grower.”
94. The audit team examined records of the investigations carried out by DAFF-DIS following hits in Kwa Zulu Natal and the Eastern Cape. It was noted that an investigation had been carried out promptly in all cases; in many on the same day as the hit. It was also noted though that the investigation record followed a standard template; it did not provide details of the shortcomings found, simply incomplete treatment, and in many cases, the inspector performing the investigation was the same inspector who had carried out the verification and/or field checks. In the case of three interceptions of CBS in pack-houses, the field checks of the three orchards involved had been carried out on the same morning as the interception. In practice, the investigation reports all indicated that ‘no problems were identified with the pesticide applications’ but provided no additional detail.

95. The DAFF-DIS managers in each region informed the audit team that the investigation reports were used to provide an overview, and were considered together with the trade at the end of each season. They were not used to review the work of individual inspectors.

5.6.2 EU notifications of interception

96. DAFF-DPH confirmed that they receive all notifications of interception from EU Member States and are responsible for notifying the affected producers and DAFF-DIS for further investigation.

97. In accordance with the CBS-RMS, the whole of the production unit concerned is immediately deregistered for export to the EU following an interception in the EU and placed on the so called 'Black List' of suspended production units. No fruit is permitted to be exported to the EU from the production unit concerned until it is reinstated.

98. DAFF-DIS carried out an investigation following each EU interception and provides a written report to DAFF-DPH. These reports have been provided to the Commission and EU Member States.

99. If the outcome of the investigations indicate a non-compliance with the CBS-RMS or the spray programme, then the production unit is suspended for the whole of the following season. Producers must apply for re-instatement as detailed in section 5.6.1 above, with the exception that, following an EU interception and ‘black-listing’, the initial reinstatement is on a probationary basis, which lasts for one year. If there is one EU interception during this period, then the whole PUC is black-listed again for export to the EU, for the remainder of the season as well as the complete consecutive export season.

100. The audit team focussed on the official action taken following an EU interception however, individual producers and packers indicated that they have also introduced additional measures to reduce the risks of EU interceptions. In particular, following three interceptions of CBS early in the 2015 season, the producers of organic lemons voluntarily suspended the export of all such fruit to the EU. Investigations carried out by DAFF-DIS and the stakeholders identified a potential problem with the copper-based
treatment regime, combined with the continuous flowering of lemons in the area, and thereby the continuous risk of infection with *P. citricarpa*.

**Conclusions on the action taken in response to non-compliances and EU notifications of interception**

101. The measures taken following a finding of non-compliance with the conditions of the CBS-RMS, or CBS, ensure that the relevant fruit is excluded from export to the EU.

102. EU interceptions are thoroughly investigated as part of the reinstatement process. However the investigation of internal interceptions (hits) is less rigorous and does not ensure an appropriate review of the validity of the control system in line with section 2.6 of ISPM 23.

103. The stakeholders have responded to problems identified during the checks; the suspension of export of organic lemons, which is a voluntary initiative, has ensured that any potential risks arising from the export of such fruit to the EU is addressed, while a suitable treatment regime is established.

### 6 Overall Conclusions

The National Plant Protection Organisation has established a robust system of official controls and other measures for the export of citrus fruit to the EU, which is in line with that required by Decision 2016/715/EU.

However, the team identified some aspects of the official field inspections and investigation of internal interceptions, which should be improved to further reduce the likelihood of interceptions of citrus black spot in 2016 onwards.

### 7 Closing Meeting

A closing meeting was held on 24 June 2016 at the headquarters of the NPPO in Pretoria, during which, the main findings and conclusions of the audit team were presented.

These were provisionally accepted by the NPPO, who expressed a strong commitment to ensure that all citrus fruit exported to the European Union complies fully with the Union’s import requirements for such fruit, while also indicating that, in line with the conclusion of their experts, the risks of introduction of CBS on fruit and the possibility of *P. citricarpa* establishing in the European Union is considered highly unlikely.
8 RECOMMENDATIONS

The competent authorities of South Africa are recommended to:

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation</th>
</tr>
</thead>
</table>
| 1.  | Ensure that the system for planning the official checks takes account of the practical considerations and operational criteria, in particular with respect to the resources necessary, so that the specified sampling method for the additional checks can be, and is, consistently applied in line with section 2.3.1 of ISPM 23 and are thereby appropriate to exclude the possible presence of *Phyllosticta citricarpa* in fields of production, in line with Article 5 (b) of Decision (EU) 2016/715.  
This recommendation is based on conclusions no 25 and 78 and the associated findings nos 9 to 13 and 56. |
| 2.  | Ensure that the action taken following a finding of non-compliance, in particular the investigation of findings of citrus black spot, enables the validity of the inspection system to be reviewed in line section 2.6 of ISPM 23 and thereby that, for exports to the EU, the treatments and official inspections are appropriate, in line with Article 5(a) and (b) of Decision (EU) 2016/715.  
This recommendation is based on conclusion no 102 and the associated findings nos 93 to 95. |

The competent authority's response to the recommendations can be found at:  
### ANNEX 1 – LEGAL REFERENCES

<table>
<thead>
<tr>
<th>Legal Reference</th>
<th>Official Journal</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dec. 2016/715/EU</td>
<td>OJ L 125, 13.5.2016, p. 16–23</td>
<td>Commission Implementing Decision (EU) 2016/715 of 11 May 2016 setting out measures in respect of certain fruits originating in certain third countries to prevent the introduction into and the spread within the Union of the harmful organism Phyllosticta citricarpa (McAlpine) Van der Aa</td>
</tr>
<tr>
<td>Dec. 2006/473/EC</td>
<td>OJ L 187, 8.7.2006, p. 35-36</td>
<td>2006/473/EC: Commission Decision of 5 July 2006 recognising certain third countries and certain areas of third countries as being free from Xanthomonas campestris (all strains pathogenic to Citrus), Cercospora angolensis Carv. et Mendes and Guignardia citricarpa Kiely (all strains pathogenic to Citrus)</td>
</tr>
</tbody>
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### Annex 2 Standards quoted in the report

<table>
<thead>
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<th>International Standard</th>
<th>Title</th>
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