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.
This report describes the outcome of an audit carried out by the European Commission in Brazil from 26 September to 6 October 2017.

This was the fifth audit by the Commission on this topic; the current audit focused on the implementation of the official export checks required by Decision 2016/715 concerning Phyllosticta citricarpa, the causative agent of citrus blackspot, and the official controls for Xanthomonas campestris, the causative agent of citrus canker required by Directive 2000/29/EC for the export of fruits of Citrus spp., from Brazil to the EU.

The audit team found that the National Plant Protection Organisation (NPPO) has established a robust system of official controls and other measures for the export of citrus fruit to the EU. The control systems for the export of citrus to the EU are broadly compliant with EU requirements concerning citrus blackspot, however they do not fully satisfy the EU’s current requirements for an official inspection and examination regime for citrus canker. The control system for citrus canker is though, compliant with the new EU requirements for the disease introduced by Directive 2017/1279, which are applicable from 1 January 2018.

A number of shortcomings were identified in the implementation of the export checks; in particular, the size of the samples inspected by the federal service at pack-houses and point of exit are too small to provide a reasonable level of confidence regarding the absence of both diseases in consignments prior to the issue of the phytosanitary certificates.

The report contains recommendations to the NPPO to address the shortcomings identified and enhance the implementation of control measures.
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<td>--------------</td>
<td>-------------</td>
<td></td>
</tr>
<tr>
<td>CBS</td>
<td>Citrus blackspot - disease caused by the fungus <em>Phyllosticta citricarpa</em> (McAlpine) Van der Aa (formerly <em>Guignardia citricarpa</em>)</td>
<td></td>
</tr>
<tr>
<td>CBS-RMS</td>
<td>Citrus blackspot Risk Management System</td>
<td></td>
</tr>
<tr>
<td>CDA</td>
<td><em>Coordenadoria de Defesa Agropecuaria</em> (State Body of Animal and Plant Health and Inspection in São Paulo State)</td>
<td></td>
</tr>
<tr>
<td>CFO</td>
<td><em>Certificado Fitosanitário de Origem</em> (Phytosanitary Certificate of Origin)</td>
<td></td>
</tr>
<tr>
<td>CFOC</td>
<td><em>Certificado Fitosanitário de Origem Consolidado</em> (Consolidated CFO)</td>
<td></td>
</tr>
<tr>
<td>Citrus canker</td>
<td>Disease caused by the bacterium <em>Xanthomonas campestris</em> (all strains pathogenic to <em>Citrus</em>) (see section 4.2 below).</td>
<td></td>
</tr>
<tr>
<td>EPPO</td>
<td>European and Mediterranean Plant Protection Organisation</td>
<td></td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
<td></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>
<td></td>
</tr>
<tr>
<td>FUNDECITRUS</td>
<td><em>Fundo de Defesa da Citricultura</em> (Citrus Protection Trust)</td>
<td></td>
</tr>
<tr>
<td>GEDAVE</td>
<td><em>Gestão de Defesa Animal e Vegetal</em> – CDA database for plant health controls.</td>
<td></td>
</tr>
<tr>
<td>IPPC</td>
<td>International Plant Protection Convention</td>
<td></td>
</tr>
<tr>
<td>ISPM</td>
<td>International Standard for Phytosanitary Measures</td>
<td></td>
</tr>
<tr>
<td>Lemon</td>
<td><em>Citrus limon</em></td>
<td></td>
</tr>
<tr>
<td>(Tahiti) Lime</td>
<td><em>Citrus latifolia</em></td>
<td></td>
</tr>
<tr>
<td>MAPA</td>
<td><em>Ministerio da Agricultura, Pecuaria e Abastecimento</em> (Ministry of Agriculture Livestock and Food Supply)</td>
<td></td>
</tr>
<tr>
<td>NPPO</td>
<td>National Plant Protection Organisation</td>
<td></td>
</tr>
<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
<td></td>
</tr>
<tr>
<td>OEDSV</td>
<td><em>Órgão Estadual de Defesa Sanitária Vegetal</em> – State government body responsible for performing plant health controls.</td>
<td></td>
</tr>
<tr>
<td>Orange/Sweet orange</td>
<td><em>Citrus sinensis</em> - includes the Navel and Valencia varieties</td>
<td></td>
</tr>
<tr>
<td>PTV</td>
<td><em>Permissão de Trânsito de Vegetais</em> (Transit Permit for Plant Material)</td>
<td></td>
</tr>
<tr>
<td>RMS</td>
<td>(Area under) Risk Mitigation System for <em>X. campestris</em></td>
<td></td>
</tr>
<tr>
<td>SFA</td>
<td><em>Superintendencias Federais de Agricultura</em> (SFA) - representation of MAPA in each state</td>
<td></td>
</tr>
<tr>
<td>Soft citrus/easy peelers</td>
<td>Includes Mandarins (<em>C. deliciosa</em>), Clementines (<em>C. reticulata</em>) and Satsumas (<em>C. unshiu</em>)</td>
<td></td>
</tr>
</tbody>
</table>
1 INTRODUCTION

The audit took place in Brazil from 26 September to 6 October 2017 as part of the European Commission's published 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).

An opening meeting was held on 26 September 2017 at the headquarters of the NPPO in Brasilia, during which the objectives and itinerary for the audit were confirmed and additional information, necessary for the conduct of the audit, was requested.

Unless stated otherwise, all data cited in this report was provided by the NPPO.

2 OBJECTIVES AND SCOPE

The objective of the audit was to evaluate the system of official controls for the certification of fruits of Citrus spp., intended for export to the EU.

The audit was carried out following the introduction of additional measures for the export of fruits of Citrus spp., originating in Brazil, and the interceptions by EU Member States of Xanthomonas campestris on limes (Citrus latifolia) in 2015/2016. In light of this, the audit focussed on the following elements:

- The implementation of the specific import requirements concerning Phyllosticta citricarpa and certain fruits of Citrus spp., introduced by Commission Decision (EU) 2016/715, including those destined exclusively for industrial processing into juice, and,
- The implementation of the measures established in point 16 of Annex IV Part A Section I to Council Directive 2000/29/EC, for the export of fruits of Citrus spp., to the EU, and in particular those concerning X. campestris.

The audit also gathered information on any pest free areas that have been established in Brazil for harmful organisms of Citrus of concern to the EU, including surveys and measures to maintain the pest free status of such areas.

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

<table>
<thead>
<tr>
<th>Competent Authorities</th>
<th>No.</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central</td>
<td>1</td>
<td>NPPO – MAPA, Brasilia</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>SFA, Saõ Paulo State</td>
</tr>
<tr>
<td>Regional</td>
<td>1</td>
<td>CDA, Saõ Paulo State</td>
</tr>
<tr>
<td>Local</td>
<td>2</td>
<td>CDA Araraquara and Catanduva, Saõ Paulo State</td>
</tr>
<tr>
<td>Inspection points</td>
<td>3</td>
<td>Santos Port and Guarulhos Airport, Pack-house Araraquara</td>
</tr>
</tbody>
</table>

### Plant health control sites

| Production sites       | 3   | Citrus producers: Saõ Paulo State |
| Pack-houses            | 2   | Saõ Paulo State |
| Authorised laboratory  | 1   | Saõ Paulo State |
| Stakeholders           | 1   | Association |
| Research institutes    | 1   | Fundecitrus, Araraquara |

### 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 Brazil.

#### 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* spp., to be imported into the EU.

Commission Implementing Directive (EU) 2017/1279 amends Annexes I to V to Council Directive 2000/29/EC. The amendments, which include changes to the requirements that should be met in order for fruits of *Citrus* spp., to be imported into the EU, take effect from 1 January 2018.

Commission Decision 2006/473/EU recognises certain third countries and certain areas of third countries as being free from *X. campestris*, *Cercospora angolensis* and Guignardia (*Phyllosticta* citricarpa).

Commission Decision (EU) 2016/715 of 11 May 2016 sets out additional measures in respect of certain fruits originating in certain countries, including Brazil, to prevent the introduction and spread of *P. citricarpa*.

References to EU legislation are to the latest amended version, where applicable. Legal references are included 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. Brazil 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 Directorate-General (DG) Health and Food Safety to Brazil concerning the export controls for fruits of Citrus spp., since 2000. The previous audit was carried out between 7 to 18 November 2011 (ref: DG(SANCO) 2011/6065).

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

4.1 PHYLOSTICTA CITRICARPA

P. citricarpa is the causative agent of citrus blackspot (CBS). The fungus is not present in the EU and is listed in Annex II Part A Section I to Directive 2000/29/EC; as such, its introduction and spread within the EU is banned.

The European and Mediterranean Plant Protection Organisation (EPPO) has published an overview of P. citricarpa on their Global Database, which provides detailed information on the harmful organism and CBS: https://gd.eppo.int/taxon/GUIGCI.

4.2 XANTHOMONAS CAMPESTRIS

X. campestris is the causative agent of citrus canker. The bacteria is not present in the EU, and is listed in Annex II Part A Section I to Directive 2000/29/EC; as such, its introduction and spread within the EU is banned. The taxonomy of X. campestris has been reviewed and changed since its original inclusion in Directive 2000/29/EC; the organism is listed as X. citri pv. citri together with a second pathovar of the same organism, X. citri pv. aurantifolii in Directive 2017/1279, while the EPPO1 preferred name for the organisms are X. citri subsp. citri and X. fuscans subsp. aurantifolii. For simplicity, X. campestris will be used in this report.

---

1 European and Mediterranean Plant Protection Organisation
EPPO has published an overview of citrus canker on their Global Database, which provides detailed information on the harmful organism and citrus canker: https://gd.eppo.int/taxon/XANTCI.

The datasheet² issued by CABI (Centre for Agriculture and Biosciences International) provides notes on the taxonomy and nomenclature for citrus canker.

### 4.3 Notifications of interception

As detailed in Table 1 below, EU Member States notified a total of 45 interceptions of harmful organisms in consignments of citrus fruit exported from Brazil to the EU between 2012 and 2017, in EUROPHYT, the EU's notification system for plant health.

<table>
<thead>
<tr>
<th>Reason</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presence of harmful organism</td>
<td>8</td>
<td>3</td>
<td>5</td>
<td>15</td>
<td>12</td>
<td>2</td>
</tr>
<tr>
<td>- <em>X. campestris</em></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>8</td>
<td>1</td>
</tr>
<tr>
<td>- <em>P. citricarpa</em></td>
<td>6</td>
<td>3</td>
<td>5</td>
<td>13</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>- <em>Elsinoe fawcettii</em></td>
<td>2</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>Other reasons, including documentary reasons.</td>
<td>3</td>
<td>8</td>
<td>14</td>
<td>9</td>
<td>125</td>
<td>29</td>
</tr>
<tr>
<td>Total</td>
<td>11</td>
<td>11</td>
<td>19</td>
<td>24</td>
<td>137</td>
<td>31</td>
</tr>
</tbody>
</table>

* - 1/1/2017 to 01/10/2017

The majority of those interceptions (29/45) were due to the presence of *P. citricarpa* on oranges (*C. sinensis*). The import of certain fruits of *Citrus* including oranges, from Brazil were, during that period, the subject of emergency measures, established by Commission Decision 2004/416/EC. In view of these interceptions, these measures were reviewed, and replaced by those established in Decision 2016/715.

As detailed in Table 1 above, a total of nine interceptions of *X. campestris* had been notified during 2016 and 2017, to the date of the audit. According to EUROPHYT, which includes data from 1997 onwards, the disease had not previously been intercepted by EU Member States on citrus fruits exported from Brazil.

The NPPO provided details of the outcome of their investigations into the reasons for the interceptions and the action taken to prevent a recurrence (see section 5.6.2 below), which included a revision of the national strategy and legislation concerning the disease (see section 5.2.2 below).

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² [https://www.cabi.org/isc/datasheet/56921](https://www.cabi.org/isc/datasheet/56921)
Member States also reported three interceptions of *Elsinoe fawcettii*, the causative agent of citrus scab, between 2012 and 2017. *Elsinoe* spp., is listed in Annex II Part A Section I to Directive 2000/29EC, against fruits of *C. reticulata* and *C. sinensis* originating in South America.

Further information on EUROPHYT, including with annual and monthly reports of interceptions, is available on DG Health and Food Safety’s website: [http://ec.europa.eu/food/plant/plant_health_biosecurity/europhyt/index_en.htm](http://ec.europa.eu/food/plant/plant_health_biosecurity/europhyt/index_en.htm).

### 4.4 PRODUCTION AND TRADE

Brazil is the largest producer of oranges in the world, with an annual production of approximately 19 million tonnes. As detailed in Table 2 below, the production of citrus intended for export to the EU, which represents only a small proportion of the national production, is concentrated in the States of São Paulo, Bahia and those areas of Minas Gerais bordering São Paulo State.

**Table 2: Production of citrus fruit, registered for export to the EU in 2016**

<table>
<thead>
<tr>
<th>Variety</th>
<th>State</th>
<th>Area (Hectares)</th>
<th>Production (tonnes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oranges</td>
<td>São Paulo</td>
<td>3 394</td>
<td>98 439</td>
</tr>
<tr>
<td></td>
<td>Bahia</td>
<td>207</td>
<td>5 181</td>
</tr>
<tr>
<td>Soft Citrus</td>
<td>São Paulo</td>
<td>18</td>
<td>507</td>
</tr>
<tr>
<td></td>
<td>Rio Grande do Sul</td>
<td>13</td>
<td>333</td>
</tr>
<tr>
<td>Limes</td>
<td>São Paulo</td>
<td>6 286</td>
<td>207 454</td>
</tr>
<tr>
<td></td>
<td>Bahia</td>
<td>2 611</td>
<td>57 449</td>
</tr>
<tr>
<td></td>
<td>Minas Gerais</td>
<td>1 915</td>
<td>47 874</td>
</tr>
<tr>
<td></td>
<td>Pará</td>
<td>563</td>
<td>9 575</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>15 007</td>
<td>426 812</td>
</tr>
</tbody>
</table>

Prior to the adoption of Normative Instruction N° 37 of 2016 (see section 5.1.2 below), units producing and consolidating citrus fruits intended for export to the EU, including Persian limes (*Citrus latifolia*), were registered under the rules on Plant Health Certification at Source.

The NPPO informed the audit team that the production of limes for export to the EU is concentrated in the northern areas of São Paulo State, with some limited production in Bahia. According to the CDA there are approximately 10 million lime plants in São Paulo State, 40% of which were in the area of Catanduva. Lime production typically takes place on small farms (less than 15 hectares), which may not have their own pack-house.

The NPPO informed the audit team that the EU is a significant export market for citrus fruits and juice. As detailed in Table 3 below, lemons account for the largest proportion of all citrus exported to the EU.
Table 3: Exports of citrus fruit to the EU, from 2015 to 2017*

<table>
<thead>
<tr>
<th>Variety</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oranges</td>
<td>19 860</td>
<td>20 828</td>
<td>3 211</td>
</tr>
<tr>
<td>Lemons</td>
<td>80 849</td>
<td>86 383</td>
<td>61 469</td>
</tr>
<tr>
<td>Soft Citrus</td>
<td>269</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Citrus fruit destined exclusively for industrial processing</td>
<td>2 207</td>
<td>2 314</td>
<td>382</td>
</tr>
<tr>
<td>Total</td>
<td>103 185</td>
<td>109 525</td>
<td>65 062</td>
</tr>
</tbody>
</table>

* - to 31 August 2017

Consolidated data for the export of limes to the EU was not available.

The port of Santos is the main point of exit for citrus exports to the EU. According to the NPPO, 68.7% of citrus exports take place using the port. There are also limited exports of limes by air between January and July each year, through Guarulhos Airport in São Paulo.

The audit team visited both of these ports to evaluate the pre-export checks being carried out there (see section 5.4.4 below).

5 FINDINGS AND CONCLUSIONS

5.1 ORGANISATIONAL ASPECTS OF PLANT HEALTH CONTROLS

Legal requirements

Directive 2000/29/EC
Decision 2016/715
ISPM N°’s 7 and 23.

Findings

5.1.1 National Plant Protection Organisation

1. The organisation of the plant health controls for the export of citrus to the EU was described in detail in the previous audit report. The NPPO informed the audit team that there have been no changes to the organisation since then.

2. In summary, plant health controls are carried out at both Federal and State level:

- At Federal level:
  - the Plant Health Department, *(Departamento de Sanidade Vegetal)*, which is part of the *Secretaria de Defesa Agropecuária* of the Ministry of Agriculture Livestock and Food Supply *(Ministerio da Agricultura, Pecuaria e Abastecimento - MAPA)* acts as the NPPO.
There is a representation of MAPA, the Superintendencias Federais de Agricultura (SFA), in each of the 26 States in the Federation. Federal inspectors from the SFA are responsible for, amongst other things, supervising and auditing the work of the state services, and performing pre-export checks of citrus fruit intended for export to the EU at pack-houses, or for limes only, at the point of exit, before issuing phytosanitary certificates.

- At State level:
  - State government bodies (Órgão Estadual de Defesa Sanitária Vegetal - OESDV) are responsible for implementing plant health policies in each state. These include inspections in places of production, sampling of oranges and lemons for testing for latent infection by *P. citricarpa*, and supervision of technical managers (‘Responsavel Tecnicos’), who are agronomists employed by the private sector and accredited for some tasks by the OEDSV. The tasks and responsibilities of the Technical Managers are as described in the previous report.

  In São Paulo State, the OESDV is the Coordenadoria de Defesa Agropecuaria (CDA).


5.1.2 Legislation

4. The national legislation of relevance to the production and export of fruits of *Citrus* spp. to the EU, was detailed in the previous report. The NPPO informed the audit team that there have been no changes to Normative Instruction Nº 3 of 8 January 2008 concerning the controls for *P. citricarpa* since that time, however, the legislation concerning the control of *X. campestris*, Portaria Nº 291 of 1997, was substantially amended in 2016, as detailed in section 5.2.2 below.

5. A summary of the legislation of relevance to the export control system that has been amended or adopted since the previous audit, is included in Table 4 below.
Table 4: Legislation of relevance to the export control system, that has been amended or adopted since 2011

<table>
<thead>
<tr>
<th>Normative Instruction</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nº 59 of 2013</td>
<td>List of regulated pests for Brazil.</td>
</tr>
<tr>
<td>Nº 37 of 2016</td>
<td>Establishes the criteria and procedures for the control of <em>X. campestris</em> – see section 5.2.2. below.</td>
</tr>
<tr>
<td>Nº 33 of 2016</td>
<td>Establishes the criteria and procedures for the issue of <em>Certificado Fitossanitário de Origem</em> (Phytosanitary Certificate of Origin (CFO) and <em>Certificado Fitossanitário de Origem Consolidada</em> (Consolidated Phytosanitary Certificate of Origin (CFOC) - see section 5.3.1 below.</td>
</tr>
<tr>
<td>Nº 28 of 2016</td>
<td>Establishes the criteria and procedures for the issue of <em>Permissão de Trânsito de Vegetais</em> (Transit Permit for Plant Material - PTV) see section 5.3.1 below.</td>
</tr>
<tr>
<td>Nº 29 of 2013</td>
<td>Establishes the criteria and procedures for issue of Phytosanitary Certificates (ISPM Nº 7 and 12)</td>
</tr>
</tbody>
</table>

5.1.3 Work planning and resources

6. The NPPO informed the audit team that officials at federal and state level perform a wide range of duties in addition to performing checks for citrus fruit exported to the EU.

7. The audit team examined the planning of inspections in São Paulo State. The inspections were planned based on the applications for registration and inspection submitted by the Technical Managers.

8. There were no field inspections being carried out at the time of the audit, however, the audit team noted that, according to the official reports of inspections, all units of production were inspected in line with the relevant Normative Instructions.

5.1.4 Guidelines and training

9. The NPPO informed the audit team that induction training and refresher training is provided by the SFA and OEDSV for all staff performing official checks of citrus fruit intended for export to the EU.

10. At state level, the training programme includes relevant legislation, pests and diseases of citrus pests and export procedures and requirements. The CDA in São Paulo State had also issued technical guidance, standard operating procedures and check lists for authorising Production Units and pack-houses producing and handling fruit for export to the EU.

11. The CDA inspectors met by the audit team in São Paulo State were trained and competent to perform the required checks, and had a high level of awareness of EU import requirements for citrus fruit. For exports to the EU, this is in line with the requirements of Article 2(1)(i) of Directive 2000/29/EC, for official statements or measures.
12. At federal level, inspectors responsible for performing export checks are provided with similar training and guidelines. While the staff met by the audit team were trained and aware of the EU import requirements for citrus fruits, the sampling guidance for performing pre-export checks of fruit, in pack-houses and the point of exit, was not interpreted, or applied, consistently. The federal inspectors also informed the audit team that their guidance did not include information or guidance concerning the presence of peduncles on citrus fruits intended for export to the EU. The lack of clear guidance is not in line with ISPM No 7 or 23, and, as detailed in sections 5.4.3 and 5.4.4 below, the official checks for fruit exported to the EU, carried out prior to the issue of a phytosanitary certificate, were not carried out appropriately, which is not in line with Article 4 of Decision 2016/715, or Item 16.2 (c) of Annex IV Part A Section I to Directive 2000/29/EC\(^3\).

13. The NPPO informed the audit team that additional training was provided in 2017, following the EU interceptions of citrus canker on limes. The training was provided by the industry funded research organisation FUNDECITRUS (Fundo de Defesa da Citricultura - Citricultural Protection Trust), and included practical field inspections as well as technical and laboratory training on \(X.\) campestris. All inspectors met by the audit team had a high level of awareness of the disease.

14. The OEDSV are responsible for providing training for the Technical Managers as part of their accreditation for issuing Phytosanitary Certificates of Origin (CFO’s) at the level of Production Unit, and Consolidated Phytosanitary Certificate of Origin (CFOCs) in the pack house (see section 5.3.1 below). During their site visits, the audit team noted that the Technical Managers had been provided with detailed guidelines and technical manuals for performing checks and pest controls and treatments, and that they had a high-level of awareness of the export requirements for citrus canker and CBS.

\[5.1.5\] Laboratories and technical support

15. As detailed in the previous report, The NPPO has authorised a network of laboratories to perform induction testing for the asymptomatic presence of \(P.\) citricarpa (see section 5.4.2 below). At the time of the audit, seven laboratories have been authorised by the NPPO to perform such testing, as well as official confirmation tests for \(P.\) citricarpa. The authorised laboratories are required to be accredited to ISO Standard 17025\(^4\) and audited by the General Coordination of Agricultural Laboratories in MAPA.

\(^{3}\) In their comments on the draft report, the competent authority in Brazil stated that "(Normative Instruction No 36 of 2006 – IN 36/2006) and international plant health certification procedures (Normative Instruction No 29 of 2013 – IN 29/2013) establish that inspection, sampling and plant health certification shall be carried out with the aim of verifying that consignments comply with the plant health requirements of the importing country. When checking the presence of the [peduncle], the ONPF questioned the audit team concerning the maximum length of stalk acceptable on citrus fruits: the team referred to the Commission’s conclusion – included in the Summary Report of the Meeting of the Standing Committee on Plants, Food and Feed, 26-27 March 2015 (Brussels, sanie.ddg2.g.dir(2015)2186217)– that up to 2 \(mm\) of stalk is acceptable, and that information was promptly forwarded to the Units certifying citrus fruits for the European Union for the purpose of standardising procedures."
16. The audit team visited one authorised laboratory and noted that it had appropriate facilities and expertise for performing the induction tests for citrus fruits exported to the EU.

17. The audit team also visited FUNDECITRUS, which carries out wide range of research on CBS, citrus canker and other harmful organisms affecting citrus, including greening (‘Huanglongbing’) and its vectors. At the time of the previous audit, the organisation also carried out surveys for CBS and citrus canker in São Paulo and neighbouring areas of Minas Gerais. This no longer takes place; surveys for those diseases are now carried out by the CDA, however, the organisation has issued detailed guidance on integrated control strategies, including the use of plant protection products and cultural methods, for these pests. It also holds regular roadshows and training sessions for industry stakeholders and official services.

5.1.6 Communication with stakeholders

18. The NPPO informed the audit team that it encourages participation by stakeholders and arranges regular meetings related to plant health and citrus, in particular to discuss the development of federal regulations for the control of CBS and citrus canker.

19. The audit team met with representative of a stakeholder organisation, who provided details of their own initiatives for pest and disease control and market access. The representative confirmed that there was frequent exchange of information and consultation with the NPPO.

Conclusions on organisational aspects of plant health controls

20. The organisation of the plant health controls for the export of citrus to the EU is in line with EU requirements concerning such exports.

21. The officials performing checks have been trained, and are qualified, to do so, but the lack of clear guidance on inspections, is reflected in the inconsistency of the pre-export checks of fruit intended for export to the EU.

22. 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, which provides additional assurances with respect to compliance at all levels of the export chain.

5.2 PhytoSanitary status

Legal requirements

Decision 2006/473/EC

4 https://www.iso.org/standards.html
Decision 2016/715
Part A of Annexes I and II to Directive 2000/29/EC
ISPM N°’s 4, 8 and 10.

Findings

23. The NPPO stated that *X. campestris*, *C. angolensis* and *P. citricarpa* are regulated pests in Brazil.

24. The NPPO publishes information on the status and control of regulated organisms on its website.  
*C. angolensis* is not present in Brazil. The situation of *P. citricarpa*, and *X. campestris* is detailed in the following two sections.

5.2.1 Phyllosticta citricarpa

25. Normative Instruction N° 3 of January 2008, established the criteria and procedures for the application of integrated measures to manage the risk of *P. citricarpa* in fruits of *Citrus* spp., intended for export. Those of relevance to exports to the EU, are detailed in section 5.3 below. The NPPO informed the audit team that the measures do not apply to limes, which are recognised by Brazil, and the EU, as not being a host to the organism.

26. The NPPO informed the audit team that the OEDSV perform annual surveys to establish the distribution of *P. citricarpa*. and that since the previous audit, *P. citricarpa* has also been found in the States of Goiás and Rondônia (2013). These states are recognised as being free from the organism in Article 3(2)(d) of Decision 2006/473/EC and the change of pest status has not been notified to the Commission, in line with the recommended reporting practices in section 4 of ISPM N° 8. The NPPO informed the audit team however, there is no production of citrus for export to the EU in either of these states.

5.2.2 X. campestris

27. The NPPO informed the audit team that *X. campestris* has continued to spread in Brazil, despite the application of eradication measures for the organism, required by *Portaria* N° 291/1997, including the mandatory felling and removal of infected plants, and all host plants with 100 m radius, which were in force at the time of the previous audit.

28. The NPPO informed the audit team that since the previous audit, citrus canker had also been found (in 2013) in the State of Ceará. That state is recognised as being free from the organism by Article 1(2)(b) of Decision 2006/473/EC, and the change of pest status has not been notified to the Commission, in line with the recommended reporting practices in

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6 At the time of the audit, limes (*C. latifolia*) were included in Item 16.4 of Annex IV Part A Section I to Directive 2000/29/EC for their export to the EU. However, they have been removed, with effect from 1 January 2018, from that Item by Directive (EU) 2017/1279. They are also not defined as ‘specified fruit’ in Decision 2016/715.
section 4 of ISPM N°8. The NPPO informed the audit team however, there is no production of citrus for export to the EU in that state.

29. The NPPO stated that, following the EU interceptions of citrus canker in limes, the national strategy and legislation for the control of the disease was reviewed by a National Working Group in 2016. The Working Group, which included stakeholder representatives and producers, recommended that a new strategy be adopted, which was implemented by Normative Instruction № 37 of 5 September 2016.

30. The Normative Instruction provides four options for the control of X. campestris:

- **Area with Pest Absent**: defined as an area where the absence of the pest has been scientifically demonstrated by surveys and is being officially maintained;
- **Pest Free Area**: defined as an area where the pest does not occur, as demonstrated by scientific evidence, and in which that status is being officially maintained;
- **Area under Eradication or Suppression**: defined as an area where the pest occurs, but is not widely distributed, and where official prevention, surveillance and control measures are employed through the systematic elimination of infected citrus plants and those suspected of being infected, with the objective of eradicating the organism, or reducing its incidence;
- **Area under Risk Mitigation System (RMS)**: defined as an area where at least two different risk management measures are applied, each of which act independently on the disease and ensure its appropriate control.

31. Individual state governments are responsible for determining which measure will be applied, within 180 days of publication of the Normative Instruction. The plant health status can apply to the Federal Unit as a whole, or to a part of it.

32. The NPPO informed the audit team that the following Federal Units produce limes intended for export to the EU: São Paulo, Bahia, Minas Gerais and Pará. Production in the latter two is less widespread. Bahia is recognised by the NPPO as an Area with Pest Absent (and by the EU as a Pest Free Area), and the state of São Paulo is recognised by the NPPO as an Area under RMS. Two Pest Free Areas have been established by the NPPO in line with the Normative Instruction; both Areas are in Pará State.

33. Normative Instruction № 37 specifies the measures that must be taken to establish and maintain each type of Area. The audit team noted that:

- the requirements for the establishment of **Areas with Pest Absent** and **Pest Free Areas**, are in line with those specified in ISPM № 4, and thereby, that fruit exported from such areas to the EU, should, subject to their status being recognised by the EU, be in line with Item 16(2) option (b) of Annex IV Part A Section I to Directive 2000/29/EC, and provided that the status has been
communicated in advance, should also be in line with the same Item, following its amendment by Directive 2017/1279;

- There are extensive requirements for establishing and maintaining Areas under Eradication or Suppression, and Areas under RMS. These include mandatory measures to be applied by the producer, including regular inspections by the Technical Manager and the application of appropriate treatments and other control measures. The Normative Instruction specifies that at least 5% of Units of Production with commercial citrus production, and all citrus plants within a 200 m radius of the inspected units must be officially inspected.

34. The CDA in São Paulo State informed the audit team that it aims to inspect approximately 10% of units annually. The units exported to the EU are not targeted, or systematically inspected by the CDA. The NPPO highlighted that all units are regularly inspected for the presence of the diseases by the Technical Manager, who are obliged to inform the CDA if citrus canker is found.

35. However, the Technical Managers, who are directly employed by the producer (or pack-house) do not fulfil the criteria for their inspections to be considered ‘official’ as defined in ISPM No 5, or for exports to the EU, in Article 2(1)(i) of Directive 2000/29/EC. Therefore, fruit produced in units that are not officially inspected by the CDA do not comply with the requirement of the first indent of Item 16(2) option (c) of Annex IV Part A Section I to Directive 2000/29/EC. However, such fruit should be compliant with the same Item and the first indent of Item 16(2)(d) of the same Directive, from 1 January 2018, following its amendment by Directive 2017/1279.

Conclusions on phytosanitary status

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

37. The national control measures for *X. campestris* have been revised in response to its continuing spread; the changes should provide enhanced guarantees as to the pest free status of citrus fruit exported to the EU.

38. However, the Commission was not notified of the changes in status of areas, recognised by Decision 2006/473/EU, as being free from *P. citricarpa* and *X. campestris*. This is of particular concern, as that Decision will be revoked with effect from 1 January 2018, and recognition of pest free areas and pest free places of production will be based on written statements provided by the NPPO instead.

### 5.3 Export procedures

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7 Applicable from 1 January 2018
Legal requirements

Directive 2000/29/EC
Decision 2016/715
Decision 2006/473/EU
ISPM Nº 7

Findings

39. The export procedures for fruits of *Citrus* spp., are established by Normative Instruction Nº 3 of January 2008 concerning *P. citricarpa*, and Normative Instruction Nº 37 of 5 September 2016, concerning *X. campestris*. As noted in section 5.2.1 above, limes are not considered to be a host to *P. citricarpa* and those fruits are therefore only subject to the measures included in Normative Instruction Nº 37.

40. The export procedures concerning registration and traceability, and *P. citricarpa* were described in detail in the previous report. The NPPO informed the audit team that there have been no significant changes to these since the previous audit.

5.3.1 Registration and traceability

41. All production units and pack houses producing and handling citrus fruits intended for export to the EU are required to register with the SFA by 31 November each year, in line with Normative Instruction Nº 33 of 2016.

42. Applications for registration must be submitted to the SFA at least 120 days before the beginning of the harvest, or earlier if needed for any phytosanitary measures to be fulfilled, in order to comply with an importing country’s requirements. In Sao Paulo State, the applications are submitted electronically in the CDA’s database for animals and plants ‘GEDAVE’ (*Gestão de Defesa Animal e Vegetal*).

43. The NPPO stated that they define a Production Unit as being a continuous area, with a variable size, registered by the plant health service, clearly delimited and geo-referenced, which is cultivated with plants of the same variety and of the same age, applying the same agricultural and phytosanitary management practices. This definition is consistent with that for ‘place of production’ in ISPM Nº 5 and Directive 2000/29/EC.

44. The OEDSV carries out a verification visit prior to registering the production unit or pack-house, to ensure that the obligations have been complied with. The SFA allocates a unique identification code for each registered production unit, and pack-house.

45. Four documents are issued to accompany the movement of fruit:

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8 [https://gedave.defesaagropecuria.sp.gov.br](https://gedave.defesaagropecuria.sp.gov.br)
- Phytosanitary Certificates of Origin (CFOs), are issued by the Technical Managers responsible for the registered production units. One CFO is issued per production unit, and is valid for one month. It contains details of the pest status of the unit, the application of any plant protection products, and information relating to the export of the fruit, including the induction testing for CBS (see section 5.4.2 below) and any additional declaration required for the internal movement of the fruit, or for export (see section 5.5 below);

- A harvest note is issued by the Technical Manager to accompany each lot of fruit from the registered production unit to the pack-house (‘Consolidation Unit’). It includes the registration number of the production unit and the quantity of fruit, which is checked and recorded in GEDAVE on arrival at the pack-house;

- Following processing and packing of the fruit, the pack-house issues a Consolidated Phytosanitary Certificate of Origin (CFOC) which includes the registration number of the pack-house and a unique identification code for the consignment. A label with the same information, is attached to each carton in the packed consignment. As detailed in section 5.4.4 below, the information in both the CFOC and the label does not allow for the identification of individual production units in consignments consisting of fruit from more than one unit, to be identified at the time of the pre-export check;

- All fruit moving from one state into another, including in transit, must be accompanied by a Transit Permit for Plant Material (PTV), which is issued by the Technical Manager based on the CFO or CFOC, using GEDAVE.

46. The obligations for registration and the issue of documents under the supervision of the NPPO is, for citrus fruit exported to the EU, in line with Article 7 of Decision 2016/715 and Item 16.2(c) of Annex IV Part A Section I to Directive 2000/29/EC, with respect to the registration of packing facilities for such fruit. However, the documents available at the time of the pre-export check (CFOC and labels) do not allow for the traceability of fruit in consignments to be traced to their production unit. This impacts on the pre-export check (see paragraph 83 below), and for exports to the EU, is not in line with the amendment to Item 16.2 (c) of Annex IV Part A Section I to Directive 2000/29/EC introduced by Directive 2017/1279 (as Item 16.2 (d) to the same Annex), which takes effect from 1 January 2018).

5.3.2 Procedures related to citrus blackspot

47. Normative Instruction № 03 of 2008 established the Citrus Blackspot Risk Management System (hereafter CBS-RMS), which is applicable to all host species (i.e. not limes), exported to the EU. The CBS-RMS was in force at the time of the previous audit, and is described in detail in that report. The NPPO informed the audit team that there have been no significant changes to the CBS-RMS since the previous audit.

48. In summary, the CBS-RMS comprises of a number of steps:
• Registration of production units and pack-houses;
• Application of pesticide treatments and other pest management measures specified by the Technical Manager;
• Verification check by OEDSV;
• Field inspections by the Technical Manager of the production unit;
• Sampling and testing for latent infection by OEDSV;
• Issue of the CFO by the Technical Manager responsible for the production unit;
• Issue of CFOC by the Technical Manager responsible for the pack-house;
• Export checks and issue of phytosanitary certificate by the SFA in the pack-house.

49. The NPPO stated that only fruit that is produced, handled and inspected in accordance with the scheme may be exported to the EU.

5.3.3 Procedures related to citrus canker

50. The requirements for export of citrus, including limes, that are hosts to X. campestris, are established by Normative Instruction No 37 of 2016. As detailed in section 5.2.2 above, the Normative Instruction provides four options for the control of citrus canker, and establishes requirements for the management of the disease.

51. The export procedures for hosts of X. campestris, which are in addition to those for its management, are similar to those for the CBS-RMS, with the exception that there are no systematic checks of Production Units, or sampling for latent infection. As noted in section 5.2.2 above, a supervisory check is carried out by the OEDSV of approximately 5% of production units.

52. The pre-export check for the issue of the phytosanitary certificate for limes is carried out by the SFA at the point of exit, and not the pack-house.

5.3.4 Export of fruits destined exclusively for industrial processing into juice

53. 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 that all fruits of Citrus exported to the EU, including those destined exclusively for industrial processing into juice, must comply with the CBS-RMS.

54. The NPPO informed the audit team that all bins are marked with appropriate labels in line with Article 9 of Decision 2016/715.

55. The requirements of the CBS-RMS satisfy those in Articles 8 to 10 of Decision 2016/715 for the export of fruits destined exclusively for industrial processing into juice in the EU.
Conclusions on export procedures

56. 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. This is in line with international standards and EU requirements concerning *P. citricarpa*.

57. However, they do not fully satisfy the EU’s current requirements for an official inspection and examination regime for *X. campestris*. The control system is though, compliant with the new EU requirements for the disease introduced by Directive 2017/1279, which are applicable from 1 January 2018.

### 5.4 Export inspections

#### Legal requirements

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

Decision 2016/715/EU

ISPM No’s 12, 23 and 31.

#### Findings

58. The system of checks required for the export of citrus fruit to the EU is established in the CBS-RMS and Normative Instruction No 37 of 5 September 2016.

5.4.1 Places of production

59. The official field inspections are carried out by the OEDSV. As noted in section 5.3 above, these concern CBS only.

60. The NPPO informed the audit team that a minimum of two official inspections must be carried out prior to harvest by OEDSV inspectors; the first is carried out following the application for registration, and focuses on verifying compliance with the technical and administrative conditions for registration. The second check is an inspection of the registered production units for the presence of CBS. The check is carried out no earlier than 30 days prior to harvest.

61. In São Paulo State, the CDA inspectors informed the audit team that their inspections were carried out based on guidelines issued by the CDA and NPPO. These require that three trees in every row, or one whole row in five, in a production unit are examined, focussing on old trees and those parts of the unit that are most exposed to the sun. If any symptoms of CBS are found, then samples are taken and sent to an authorised laboratory for confirmation and the production unit is suspended immediately in GEDAVE.

62. The audit team met with CDA staff responsible for performing checks, and the Technical Managers responsible for production units exporting to the EU in São Paulo State and noted that:
• The Technical Managers had maintained a log-book, which included the results of their monitoring inspections, which are carried out weekly by the Technical Managers with the support of scouting staff, and the plant protection products that had been applied. The CDA had checked the log-book and had signed and dated the records to confirm that the records and treatments were in line with the CBS-RMS;

• Plant protection products had been applied, at the frequency required by the CBS-RMS and the guidance issued by FUNDECITRUS;

• The places visited had been inspected by the CDA prior to harvest and that in all cases, this was done no more than 30 days prior to harvest.

63. The checks are carried out by officials at appropriate times, which for export to the EU, is in line with the requirements of Article 4 of Decision 2016/715 concerning the absence of symptoms of *P. citricarpa* in places of production.

64. As detailed in section 5.3 above, the OEDSV or SFA do not carry out systematic checks of units producing limes for export to the EU. The Technical Manager is responsible for performing controls, including checks for the possible presence of *X. campestris*. The audit team visited two producers of limes intended for export to the EU, in São Paulo State, and noted that:

• The Technical Managers had maintained a log-book detailing the outcome of their inspections as well as any preventative treatments that had been applied. In the case of one producer, the Technical Manager was employed by the packhouse that received his fruit. In this case the Technical Manager had recommended appropriate treatments, which were recorded in the log-book;

• The plant protection products applied, and the frequency of applications were consistent with those required by the RMS for citrus canker and the guidance issued by FUNDECITRUS;

• The checks by the Technical Manager had been carried out on a weekly basis and no evidence of citrus canker had been found;

• Both production units and the associated log-books had been inspected by the CDA during the growing season. The outcome of their inspection was recorded in the log-book;

• The Technical Manager had issued CFOs to accompany the fruit to the packhouse, which included an appropriate additional declaration, for export to the EU.

65. The production units for limes intended for export to the EU and their immediate vicinity are not subject to a systematic official control and examination regime, to ensure that no symptoms of *X. campestris* have been observed since the beginning of the last cycle of vegetation as required by Item 16.2 (c) of Annex IV Part A Section I to Directive 2000/29/EC for the export of fruits of *Citrus* spp., to the EU. The system of controls is in
line however, with Item 16.2 (d) as amended by Directive 2017/1279, which takes effect from 1 January 2018.

5.4.2 Sampling for latent infection

66. The procedures for sampling and testing for latent infection by *P. citricarpa*, was detailed in the previous report. It is based on a standard method developed by the NPPO. The OEDSV, or Technical Manager under direct supervision by the OEDSV, collects a sample of 1 fruit/tree from 1% of trees in each production unit, 30 days prior to harvest. The OEDSV seals the sample, which is then delivered by the Technical Manager to an authorised laboratory, for the induction test.

67. The laboratory specialist treats the sample with Ethephon at a rate of 750 ppm combined with Imazil (1g/l water), after which, the sample is maintained in between 25 to 28°C in constant light for 28 days. Each fruit in the sample is examined every 7 days by the laboratory specialist, for signs of CBS. If no signs are found after 28 days, then the sample is recorded as negative for CBS, and harvest is permitted. The laboratory specialists met by the team stated that any signs of CBS are confirmed by PCR, in line with the method established in ISPM No 27 for identifying *P. citricarpa*.

68. The NPPO informed the audit team that in 2016, a total of 273 tests had been carried out in São Paulo State, out of which, 123 developed symptoms of CBS. In 2017, to the date of the audit, 138 tests had been carried out, out of which 60 had developed symptoms of CBS.

69. The NPPO informed the audit team that the high proportion of positive samples was due in part to the targeted sampling, which focusses on the highest risk plants, and the optimal conditions for the development of the disease in which the samples are kept.

70. The checks for latent infection are not required for the import of fruits of *Citrus* spp., from Brazil. However, considering the high level of asymptomatic infection detected and thereby excluded from export to the EU, the testing provides significant additional assurance with respect to the pest freedom of that citrus fruit which is exported to the EU.

5.4.3 Pack-house

71. The NPPO informed the audit team that the OEDSV carries out occasional supervisory checks in pack-houses during the export season, in order to confirm that the conditions for registration, including the checks by the Technical Manager are being maintained.

72. The CDA informed the audit team that in the area of Araraquara in São Paulo State, four unannounced checks are carried out at each pack-house in order to verify that the specified post-harvest treatment (sodium hypochlorate) is being applied correctly, and that leaves and fruit not suitable for packing are being disposed of appropriately. In the area of Catanduva, the CDA carries out similar checks of the 32 pack-houses in the area twice each year, focussing on the 11 pack-houses that process fruit for export to the EU.
73. The audit team visited pack-houses in both areas and examined the records of processing and packing including the CFOs received from the production unit and the CFOCs issued by the pack-house, and noted that these were in line with the requirements of the CBS-RMS and Normative Instruction N° 37, and for export to the EU, the traceability requirements in Article 7 of Decision 2016/715. The records confirmed that the post-harvest treatment required by Item 16.2 (c) of Annex IV Part A Section I of Directive 2000/29/EC for X. campestris, had been applied.

74. The Technical Managers responsible for the pack-houses had been trained by the NPPO every five years, and were fully familiar with the EU requirements for the import of citrus fruit, including the harmful organisms of concern. The Technical Managers informed the audit team that they had not been provided with guidance concerning the presence of peduncles on packed fruit.

5.4.4 Pre-export

75. Federal inspectors from the SFA in each state perform the official checks of packed consignments in the pack-house for all citrus fruit, except limes, which are inspected only at the port immediately prior to shipment.

76. The procedures for performing the pre-export checks are established by Normative Instruction N° 36 of 2006, which includes a sampling table (N° 4) for calculating the size of the sample of the packed fruit to be inspected, in the pack-house or the point of exit. In the case of citrus fruit, the table indicates that the sampling unit is ‘box’ and the percentage of the units to be inspected for lot sizes from 1 box to more than 20 001 boxes. It also provides the total weight for the sample, in kilogrammes.

77. The audit team observed sampling and checks being carried out at Santos Port and Guarulhos Airport and received a demonstration of a check at a pack-house in Araraquara. The audit team noted that:

- The SFA inspectors had been trained to perform the checks and were familiar with EU requirements for the import of citrus fruit and harmful organisms of concern;
- The inspectors at each of the three locations provided a different explanation for the use of the sampling table, and the resulting sample sizes were different:
  - At Santos Port, the SFA inspectors indicated that a standard sample of four boxes was taken from each container (of limes), which typically hold 5 200 boxes, for inspection;
  - At Guarulhos Airport, the SFA inspectors drew a sample of fruit from the number of units indicated in the sampling table. This resulted in a single sample of 6 Kg of fruit, drawn from 10 to 15 boxes in a consignment consisting of 2 148, 6 Kg boxes;
At the pack-house, the SFA inspector stated that the sample was drawn based on the weight of the sample specified in the sampling table, and the weight of individual boxes. In the case of a typical consignment, consisting of 20 tonnes of oranges packed in 1,333, 15 kg cartons, the sample size was two cartons.

78. The size of the samples taken for inspection is not consistent and would, according to the guidance in ISPM N° 31, result in a confidence level significantly below 95% of detecting a 5% level of infestation in all three cases above. This very low probability of detecting any harmful organisms that may be present in the consignments, means that the official pre-export checks cannot be considered appropriate for that purpose, for fruits of *Citrus* spp., intended for export to the EU, in line with Article 4 of Decision 2016/715 concerning *P. citricarpa*, and Item 16.2 (c) of Annex IV Part A Section I to Directive 2000/29/EC.

79. The audit team also noted that, in the case of consignments consisting of fruit from a number of production units, it is not possible to identify the individual production units from the labels affixed to each box. It is therefore not possible for the SFA to ensure that a representative sample of fruit from each production unit has been examined, to ensure that *none of the fruit harvested in the place of production* has shown symptoms of *P. citricarpa*, in line with Article 4 of Decision 2016/715, or symptoms of *X. campestris*, in line with Item 16.2 (c) of Annex IV Part A Section I to Directive 2000/29/EC. That Item has been amended (as Item 16.2 (d)) by Directive 2017/1279, which does not include the text in italics above.

80. The SFA at Santos Port informed the audit team that a pilot project on the use of quick-test kits was started in 2016, which allows for a rapid initial on-site test of possible initial signs of citrus canker for the presence of *X. campestris*. This had resulted in two findings of the disease. The SFA indicated that in light of this, the test kits would continue to be used.

### Conclusions on export inspections

81. The NPPO has established a comprehensive system of official inspections for the export of citrus fruit to the EU, which includes a combination of checks by trained technical managers and official checks by state inspectors for *P. citricarpa*, and of all fruit, by federal inspectors.

82. The checks by the state services are carried out appropriately, however the checks by the federal service are based on a sample size that is too small, according to international standards, to provide a reasonable level of detection and confidence concerning the absence of both *P. citricarpa* and *X. campestris* in fruits of *Citrus* spp., intended for export to the EU.
83. Those checks are also carried out on packed consignments, in which it is not possible to identify the production units of the fruit, or therefore, to ensure that none of the fruit harvested in those places has shown signs of *P. citricarpa* and *X. campestris* as required for export of citrus fruits to the 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 No 12.

**Findings**

84. Phytosanitary certificates are only issued by federal inspectors from the SFA, after the pre-export check has been carried out, in the pack-house or point of exit.

85. The additional declarations included on the phytosanitary certificates are based on those made by the Technical Manager on the CFO and CFOC, confirming which measures, required by the CBS-RMS and Normative Instruction No 37 of 2016 have been applied. The serial number of the CFOC(s) accompanying the consignment are recorded on the phytosanitary certificate.

86. In the event that the phytosanitary certificate is issued after the consignment has been despatched, the SFA include the date of inspection as an additional declaration.

87. As detailed in Table 1 above, there was a significant and sharp increase in the number of notifications of interceptions for reasons other than the presence of harmful organisms in 2016. The audit team noted that the majority of these related to consignments that had been despatched immediately prior to the adoption of Decision 2016/715, and were accompanied by phytosanitary certificates with additional declarations citing Decision 2004/416/EC, which were no longer valid, following the adoption of the new Decision.

88. The procedures for the issue of phytosanitary certificates, including the use of additional declarations, are in line with the requirements of ISPM No 12. For exports to the EU, the additional declarations are consistent with those required by Item 16 of Annex IV Part A Section I to Directive 2000/29/EC and Article 4 of Decision 2016/715.
Conclusions on phytosanitary certificates

89. The procedures for the issue of phytosanitary certificates for the export of citrus fruit to the EU, ensure that the certificates are only issued by the federal service, and only for fruits of *Citrus* spp., that comply with the export procedures and checks established by the NPPO.

5.6 ACTION TAKEN IN RESPONSE TO NON-COMPLIANCES AND EU NOTIFICATIONS OF INTERCEPTION

Legal requirements

ISPM No’s 7 and 23.

Findings

5.6.1 Non-compliances

90. The NPPO informed the audit team that in the event that CBS was found during the field checks, testing for latent infection or inspections in the pack house, that the production unit is excluded from export to the EU. The unit is suspended in GEDAVE to prevent the issue of Transit Permits for Plant Material and thereby, movement to other States, or for export for the remainder of the season.

91. Similar action is taken if citrus canker is found during the supervisory check, or pre-export check at the pack-house or point of exit, but it applies to all adjacent production units as well. Additional measures may be taken depending on the status of citrus canker in the state concerned.

92. The NPPO stated that production units that were found not to comply with the conditions of the CBS-RMS and/or the measures against citrus canker would also be disqualified for export to the EU for the remainder of the season.

5.6.2 EU notifications of interception

93. The NPPO informed the audit team that action is always taken following receipt of a notification of interception, as summarised in Table 5 below.

Table 5: Action taken following receipt of an EU notification of interception

<table>
<thead>
<tr>
<th>Reason for notification</th>
<th>Action taken</th>
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<tbody>
<tr>
<td>Documentary non-compliance</td>
<td>Investigation where the error occurred and provision of guidance to prevent a recurrence.</td>
</tr>
<tr>
<td>Presence of harmful organism</td>
<td>Notification to the exporter and to the OEDSV, suspending further exports from the production unit concerned, pending the outcome of an investigation of the reasons for the interception by the state service. Additional sanctions and penalties may be applied if necessary.</td>
</tr>
<tr>
<td>Other types of non-compliance</td>
<td>Notification to the exporter and request to the OEDSV to investigate cause, Sanctions and penalties may be applied if necessary.</td>
</tr>
</tbody>
</table>
94. As detailed in Table 1 above, there was a peak in interceptions by EU Member States of *X. campestris* in 2016. These were the subject of a specific investigation, which, as detailed in section 5.2.2 above, led to a review of the national control strategy and legislation for the disease.

95. The NPPO informed the audit team that SFA and CDA carried out investigations at all pack-houses and production units linked to the EU interceptions of *X. campestris*:

- Ten pack-houses were audited, and various irregularities were identified in eight of those. Notices of infraction were issued against these eight pack-houses and four Technical Managers were suspended, due to supervision and control failures;
- 45 production units related to the interceptions were audited, and irregularities, including the presence of citrus canker, were identified in 12 units. Notices of infraction were issued against 17 Technical Managers.

96. The audit team visited one pack-house and two producers of limes that were involved in EU interceptions and verified that the above action had been taken.

97. The action taken following a finding of non-compliance and following receipt of an EU interception, including a review of the national control strategy and legislation for the harmful organism concerned, is in line with ISPM No 7 and section 2.6 of ISPM No 23.

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

98. The measures taken following a finding of non-compliance with the export procedures or the presence of a harmful organism, are in line with relevant international standards and ensures that the fruit concerned is excluded from export to the EU.

99. Action is taken following an EU interception, including an appropriate review of the validity of the control system in line with international standards. It provides additional assurance with respect to the guarantees provided by the export control system, in particular concerning *X. campestris*; the interceptions of which have consequently declined rapidly.

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. The control systems for the export of citrus to the EU are broadly compliant with EU requirements concerning citrus blackspot, however they do not fully satisfy the EU’s current requirements for an official inspection and examination regime for citrus canker. The control system for citrus canker is though, compliant with the new EU requirements for the disease introduced by Directive 2017/1279, which are applicable from 1 January 2018.
A number of shortcomings were identified in the implementation of the export checks; in particular, the size of the samples inspected by the federal service at pack-houses and point of exit are too small to provide a reasonable level of confidence regarding the absence of both diseases in consignments prior to the issue of the phytosanitary certificates.

7 CLOSING MEETING

A closing meeting was held on 6 October 2017 at the headquarters of the NPPO in Brasilia, 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.

8 RECOMMENDATIONS

The competent authorities of Brazil are recommended to:

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation</th>
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</table>
| 1.  | Ensure that any change in the status of *P. citricarpa* or *X. campestris* recognised by Decision 2006/473/EC, or that previously notified to the Commission in line with Item 16.2 of Directive 2000/29/EC, is promptly reported to the Commission in line with section 4 of ISPM No 8.  
*This recommendation is based on conclusion No. 38*  
*Associated findings No.’s 26 and 28* |
| 2.  | Ensure that the size of the sample of fruits of *Citrus* spp., intended for export to the EU that is inspected prior to the issue of the phytosanitary certificate, provides an appropriate probability of detecting any harmful organisms that may be present, and is consistently applied, in line with ISPM No 31.  
*The recommendation is based on conclusion No. 82*  
*Associated findings No.’s 77 and 78* |
| 3.  | Ensure that the sample of fruits of *Citrus* spp., intended for export to the EU that is inspected prior to the issue of the phytosanitary certificate, is representative of all units of production in the consignment, and thereby that none of the fruits harvested in those places have shown signs of *P. citricarpa* in line with Article 4 of Decision 2016/715.  
*The recommendation is based on conclusion No. 83*  
*Associated finding No. 79* |
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<th>No.</th>
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| 4.  | Ensure that the officials performing official checks are provided with clear guidelines, in order to ensure that those checks of fruits of *Citrus* spp., intended for export to the EU are carried out appropriately, in all cases, in line with Article 4 of Decision 2016/715 and Item 16.2 (d) of Annex IV Part A Section I to Directive 2000/29/EC.  

*The recommendation is based on conclusion Nos. 21 and 82  
Associated finding Nos. 12, 77 and 78*

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>
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### ANNEX 2 STANDARDS QUOTED IN THE REPORT

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