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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

SOUTH AFRICA

FROM 07 TO 17 JUNE 2011

IN ORDER TO EVALUATE THE SYSTEM OF OFFICIAL CONTROLS AND CERTIFICATION
OF CITRUS FRUIT FOR EXPORT TO THE EUROPEAN UNION

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

The report details the outcome of an audit carried out to South Africa from 7 to 17 June 2011. 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 European Union (EU), according to the requirements of Council Directive 2000/29/EC. The audit team also assessed the action taken to address the recommendations made following a previous mission on the same topic (DG(SANCO)/2009-8184) and gathered other relevant information on phytosanitary aspects of Citrus production following a request by the South African authorities for an extension of the pest free areas (PFA) for citrus black spot (CBS) in South Africa.

The general system of export controls for citrus fruit exported to the EU is based on the application of treatments against CBS and fruit flies in the field of production and an inspection immediately after processing and packing of the fruit. It is supplemented by field inspections in case of high risk areas.

The whole system of export checks has been improved and strengthened since the 2009 mission and reduces significantly the risk of introduction of CBS. All fruits originating from the same orchard found to be infested are now excluded from export to the EU.

However, the official checks are carried out on a representative sample of all *Citrus* fruit intended for export to the EU following processing and packing and not on all fruits harvested and this is not fully in line with EU requirements for fruit originating outside of the PFA recognised by Commission Decision 2006/473/EC.

The surveys and measures applied to the established and proposed PFAs for CBS were generally found to be in line with the relevant International Standards.

The National Plant Protection Organisation (NPPO) takes appropriate action following internal and EU interceptions, and has implemented changes in the control system for False Codling Moth.

Recommendations are made to the competent authorities to address the shortcomings identified.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
APIS	Directorate Agricultural Product Inspection Services of the Department of Agriculture, Forestry and Fisheries now called Inspection Services (IS)
CBS	Citrus black spot - disease caused by the fungus <i>Guignardia citricarpa</i> Kiely (all strains pathogenic to Citrus)
CGA	Citrus Growers Association of Southern Africa
CITRUS CANKER	Disease caused by the bacterium <i>Xanthomonas campestris</i> pv. <i>Citri</i> (Hasse) Dye (all strains pathogenic to Citrus), or <i>Xanthomonas axonopodis</i> pv. <i>Citri</i> (Hasse) Vauterin <i>et al</i>
CRI	Citrus Research International of South Africa
DAFF	Department of Agriculture, Forestry and Fisheries
DPH	Directorate Plant Health of the Department of Agriculture, Forestry and Fisheries
EFSA	European Food Safety Agency
EU	European Union
EUROPHYT	European Network of Plant Health Information Systems-in this report it refers only to the component constituting the Community's notification system for interceptions for plant health reasons.
FBO	Food Business Operator
FCM	False codling moth, <i>Thaumatotibia leucotreta</i> previously known as <i>Cryptophlebia leucotreta</i>
FPEF	Fresh Produce Exporters' Forum
FVO	Food and Veterinary Office of the European Commission
Grapefruit	<i>Citrus paradisi</i>
Ha	Hectare
IPPC	International Plant Protection Convention
IS	Inspection Services of the Department of Agriculture, Forestry and Fisheries
ISPM	International Standard for Phytosanitary Measures

IT	Information Technology
Lemon	<i>Citrus limon</i>
MS	Member State of the EU
NPPO	National Plant Protection Organisation
NPPOZA	National Plant Protection Organisation of South Africa
Orange/Navel/Valencia	<i>Citrus sinensis</i> - sweet orange - includes the Navel and Valencia varieties
PC	Phytosanitary Certificate
PCR	Polymerase chain reaction
PFA	Pest Free Area
PHC	Pack House Code
PPECB	Perishable Products Export Control Board
PU	Production Unit - equivalent to 'place of production'
PUC	Production Unit Code
SA	Republic of South Africa
Soft citrus/easy peelers	Mandarin (<i>Citrus deliciosa</i>) and Clementine (<i>Citrus reticulata</i>), Satsuma (<i>Citrus unshiu</i>) and Naartjie (<i>Citrus nobilis</i>)
SOP	Standard Operating Procedure
t	Metric tonne

1 INTRODUCTION

The audit took place in South Africa from the 7 to 17 June 2011. The audit was undertaken as part of the Food and Veterinary Office (FVO) planned audit programme.

The FVO team consisted of 2 inspectors from the FVO and 1 National Expert from a Member State. Representatives from the National Plant Protection Organisation (NPPO) accompanied the FVO team during the audit.

An opening meeting was held on 7 June 2011 at the headquarters of the Department of Agriculture, Forestry and Fisheries (DAFF) in Pretoria, during which the objectives and itinerary for the audit were confirmed and additional information, necessary for the conduct of the audit, was requested.

2 OBJECTIVES

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 European Union, according to the requirements of Council Directive 2000/29/EC. The audit team also gathered relevant information on phytosanitary aspects of *Citrus* production and additional information on the possible extension of pest free areas (PFA) for citrus black spot in South Africa.
- To follow up recommendations made in report DG(SANCO)/2009-8184.

In pursuit of these objectives, the following sites were visited:

Competent authority visits			Comments
Competent authority	Central	1	<i>DPH, IS, PPECB</i>
Local offices	NPPO	3	<i>Durban</i>
	PPECB	2	<i>Durban</i>

Laboratory visits			Comments
Technical institutes/research stations		1	<i>CRI Nelspruit</i>

Plant health control sites		Comments
places of production/producers pack-houses (CBS present);	6	<i>Limpopo, Mpumalanga, Gauteng Province;</i>
places of production/producers pack-houses (CBS free);	4	<i>Northern Cape Province;</i>
Ports (points of exit)	1	<i>Durban</i>
Nursery and garden centre	2	<i>Northern Cape Province</i>

3 LEGAL BASIS

The audit was carried out under the provisions of Articles 21 and 27a of Council Directive 2000/29/EC, and by agreement with the National Plant Protection Organisation of South Africa.

All Community legislation referred to in this report is listed in Annex I to this report. Reference to legislation is to the latest amended version, where applicable.

International Standards for Phytosanitary Measures (ISPMs) are issued by the International Plant Protection Convention of which both the EU and South Africa are members. These standards are recognised as international benchmarks for phytosanitary control and Article X (4) of the International Plant Protection Convention 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 of particular relevance to this audit are listed in Annex II.

The full text of all adopted ISPMs is available on the International Phytosanitary Portal of the International Plant Protection Convention (www.ippc.int).

4 BACKGROUND

This was the third audit carried out by the FVO to South Africa related to the export of citrus fruits. The first took place in September 1998 followed by one in 2009, the reports of these audits (ref DG/SANCO/1391-1998 and DG(SANCO)2009-8184) are available on the FVO's website: http://ec.europa.eu/food/fvo/ir_search_en.cfm.

Prior to the audit the NPPO of South Africa submitted an application for the recognition of a new PFA for the causal agent of the citrus black spot disease (CBS).

CBS is included in Annex I Part A Section I of Council Directive 2000/29/EC and as such, is prohibited from entry and spread within the EU. The status and distribution of CBS in South Africa is recognized by Commission Decision 2006/473/EC.

4.1 NOTIFICATIONS OF INTERCEPTIONS

Between 1 January and 31 December 2010, a total of 16 notifications of interceptions of harmful organisms on citrus fruits originating in South Africa, were reported by Member States in EUROPHYT, the EU's notification system for plant health. These included 2 interceptions of *Cryptophlebia leucotreta*, 11 interceptions of CBS and 3 interceptions of non-European Tephritidae (fruit flies).

4.2 PRODUCTION AND TRADE INFORMATION

4.2.1 Production

South Africa is the 12th largest producer of citrus fruits in the world with an estimated annual production of more than 2.25 million tonnes. The area planted with oranges, grapefruit, soft citrus and lemons has increased since 2009 as detailed in table 1 below.

Table 1: Total area planted with citrus, by type (source: NPPO) .

Variety	Area 2009 (ha)	Area 2011 (ha)	% of Area in 2009	% of Area in 2011
Oranges	38 943	39 617	69%	68%
Grapefruit	8 588	9 075	15%	15%
Soft Citrus	4 684	4 960	8%	9%
Lemon	4 408	4 449	8%	8%
Total	56 623	58 101	100%	100%

Citrus production occurs in many areas of South Africa, but is concentrated in the Western and Eastern Capes and the north east (Limpopo and Mpumalanga) of the country as detailed in the following table.

Table 2: Main production areas for citrus fruit (source: NPPO 2006).

Province	Area (ha)
Limpopo	17 452
Western Cape	11 852
Mpumalanga	10 762
Eastern Cape	10 054
KwaZulu Natal	4 022
Northern Cape	683
North West	34
Total	54 859

The average size of the production units (PU) is forty hectares. There are approximately 1,750 of these, of which 1,643 have been registered for export to the EU. Each PU consists of a number of orchards or blocks with an average size of 5ha. There are therefore 8 orchards or blocks in the average PU. As detailed in the previous report, orchards are considered to be equivalent to 'field of production' as used in Directive 2000/29/EC, and PU are considered equivalent to 'place of production' as used in the same Directive and as defined in ISPM N^o 5.

The timing of the key stages for citrus fruit production varies depending on variety and location, giving a long overall season for South African citrus exporters (March to October).

4.2.2 Exports

The EU is South Africa's biggest export market for fresh citrus fruit; other important markets include Eastern Europe and the Middle East, Far East and the demand of these markets is increasing. South Africa exports approximately 600,000 tones of citrus to the EU between April and November each year, as detailed in table 3 below.

Table: 3. Citrus fruit exports from 2006 - 2010 (source: NPPO).

Citrus	2006 (tons)	2007 (tons)	2008 (tons)	2009 (tons)	2010 (tons)
Orange	302 908	456 001	452 640	359 123	428 438
Lemon	36 292	28 316	60 347	35 911	42 678
Soft Citrus	55 602	65 453	65 171	59 057	60 200
Grapefruit	86 698	109 305	98 385	109 404	96 176
Total	481 500	659 075	676 542	563 495	627 492

A significant proportion of the total crop is exported and the NPPO stated that the South African citrus industry is of great importance in particular to the rural economy.

Further details on the production import and export of citrus fruits from South Africa can be find in the 2009-8184 report.

4.3 CITRUS BLACK SPOT

CBS is caused by the fungus *Guignardia citricarpa*. It has not been found in Europe and CBS is listed as a harmful organism in Annex II Part A Section I to Council Directive 2000/29/EC. The Directive includes a number of special requirements that should be met in order for susceptible fruits to be imported into the EU. The status of CBS in South Africa is detailed in section 5.2.1.1 below. EFSA issued an opinion on CBS on 3 March 2009. (EFSA Journal (2008) 925, 1-4). There has been ongoing dialogue between South Africa and the EU regarding CBS since 2000 when South Africa submitted a draft Pest Risk Analysis for CBS to the EC Standing Committee on Plant Health (SCPH), which has included the exchange of information on the disease. The dialogue on the matter of the strength of EU phytosanitary import conditions pertaining to CBS has not yet been concluded; the above EFSA report relates to this matter.

The full text of the opinion, which includes further technical information in particular on climate factors and the distribution of CBS, is available on their website: www.efsa.eu.

5 FINDINGS AND CONCLUSIONS

5.1 ORGANISATIONAL ASPECTS OF PLANT HEALTH CONTROLS

Legal basis

Article 2(1)(i) of Council Directive 2000/29/EC establishes the requirements for a measure or statement, to be considered as 'official'. In particular, '... if it is made by representatives of the official national plant protection organisation of a third country, or, under their responsibility, by other public officers who are technically qualified and duly authorized...'

ISPM 7 describes the basic elements of the phytosanitary certification process and the requirements for a certification system to fulfil these functions. Sections 1 (Legal Authority), 2 (Management responsibility), 3 (Resources), 4.3 (Procedures), 5 (Communication) and 6 (Review mechanism) are of particular relevance.

ISPM 23 describes the objectives and requirements for inspections. Of particular relevance here, are sections 1.3 (responsibility for inspection) and 1.4 (Requirements for inspectors).

5.1.1. National Plant Protection Organisation

Findings

The organisational aspects of plant health control in South Africa were described in detail in the 2009-8184 report.

There have been changes subsequently, and a new departmental structure was implemented on 1 April 2011. In summary, the NPPO of SA consists of the Directorates for Plant Health (DPH) and the Inspection Services (IS), formerly known as 'Agricultural Product Inspection Services', in the Department of Agriculture, Forestry and Fisheries (DAFF).

The only structural change in the plant health area is that the Sub-Directorate of Diagnostic and Quarantine Services have been moved from DPH to IS.

The roles of the Directorate Plant Health, Directorate Inspection Services and the Perishable Product Export Control Board are still as highlighted in 2009-8184 report, although the responsibility of providing quarantine services and plant pest diagnostic services has been transferred from the phytosanitary policy unit, DPH to the relevant operational unit, IS.

The Perishable Products Export Control Board (PPECB) remains as an assignee of the DAFF and conducts quality assurance inspections and certification for exports from SA, including the plant health check of citrus fruit intended for export to the EU.

Further information on DAFF, DPH and IS is available on the DAFF website: www.daff.gov.za

Conclusions

There is a clear structure and division of responsibilities within the NPPO.

5.1.2 Delegation of official controls

Findings

Responsibility for the pre-export phytosanitary check has been formally delegated to the PPECB by the NPPO, by the Perishable Products Export Control Act (Act 9 of 1983) and the Agricultural Products Standards Act, 1990 (Act 119 of 1990). The PPECB carries out the official phytosanitary inspections at the pack-houses at the same time as the quality assurance check, which the PPECB carries out for all fresh produce exported from South Africa.

As already described in the last report the PPECB staff are effectively public servants and measures are in place to ensure that its staff are free from potential conflicts of interest.

Since the last mission a system of regular audits of the PPECB inspectors has been introduced. The PPECB inspectors are checked internally by the so called Harmonization unit and by the DAFF, on random bases through unannounced on site visits.

The FVO team noted that:

- During the visit to one of the pack houses the DAFF audit team was on site inspecting the pack house, including traceability elements, presence of CBS and the activities of the PPECB inspectors.

The DAFF auditors met informed the team that

- Their visits are planned based on internal risk management like for e.g. the audits target those places where CBS had been found previously including PU, pack-houses from the Alert list but also the cold stores are audited, and
- All inspectors working in pack-houses are to be audited by the end of the season as stated by DAFF ;
- The audits are unannounced.

Further information on the PPECB is available on their website: www.ppecb.com

Conclusions

Responsibility for carrying out the pre-export checks has been formally delegated by the NPPO to the PPECB. This delegation is in line with the requirements of Article 2(1)(i) of Council Directive 2000/29/EC and the system has been strengthened by the new audit system.

5.1.3 Training and guidelines

Findings

The system of induction training for the newcomers and refresher training conducted mainly prior the export season has not changed since the previous mission.

During the audit the FVO team noted that:

- The inspectors of the IS and PPECB were provided with SOPs and guidelines;
- The guidelines on completion of Phytosanitary Certificates (PC) in the part dealing with the Additional declarations (AD) did not refer to all the options of the Council Directive 2000/29/EC in particular the reference to the PFA origin was missing even though SA has recognised PFA for CBS¹;
- Updated guidelines had been provided in draft form in May 2010 with no clear time-frame for approval or finalisation².

1 *In their response to the draft report the Competent Authority noted that the concern has been addressed by DAFF IS and all options are currently correctly referenced on ADs in compliance with the Council Directive 2000/29/EC.*

2 *In their response to the draft report the Competent Authority noted that regarding the draft documents dated May 2011, all of these guidelines were re-evaluated, finalized and circulated to all inspectors and role players before the start of 2011 season. It was unfortunate that some of the old documents were still in the files of the inspectors. This concern was rectified by DAFF IS and all inspectors were instructed to make sure that they have the latest documents and guidelines available at all times.*

Conclusions

The staff responsible for carrying out export controls are provided with regular training as well as guidelines and standard procedures. However, lack of the relevant information in the guidelines for completion of PC could result in incorrect information about whether the consignment originates from PFA or not and in the case of finding CBS the status of PFA can not be correctly assessed.

5.1.4 Communication and consultation with stakeholders

Findings

There are a number of associations that play an important role in the export of citrus to EU including the following: Citrus Growers Association (CGA), Citrus Research International (CRI) Fresh Produce Exporters' Forum (FPEF). The role of each is as described in the 2009-8184 report.

The CRI has an Extension Division, which provides technical information and advice directly to producers through monthly study groups in each region. These groups provide growers, pack-houses and exporters with pest and disease management guidelines and other relevant information.

During the site visits it was noted that:

- The producers and pack-house managers were fully aware of and regularly referred to the production and treatment guidelines provided by the CRI;
- The production follows, as stated by the producers, the latest technological knowledge received from CRI;
- A large amount of additional information is provided to the producers in the form of publications, forums etc.;
- The study groups are, as stated by the involved stakeholders, a great opportunity to reflect on the problems and inform the CRI on the possible future research needs as well;
- The exporters are required to implement the production and treatment guidelines and that this is verified by IS during the registration.

Conclusions

There is a good communication between the competent authorities and stakeholders involved in the export process; good awareness, motivation and sensitivity towards the CBS issue within the industry. The mandatory implementation of guidance provided by CRI gives additional assurances with regards to the implementation of the export control system by all parties.

5.1.5 Laboratories and diagnostics

Findings

The laboratories and the diagnostic facilities are as presented in the 2009-8184 report. In addition to the three laboratories involved in the CBS analyses, namely DAFF Diagnostic laboratory in Stellenbosch; Citrus Research International, Nelspruit; and University of Pretoria, Department Microbiology and Plant Pathology, Pretoria; one extra laboratory called PROTEIOS INTERNATIONAL, Pietermaritzburg was accredited for carrying out analysis of suspected CBS, in 2010.

The NPPO's Plant Health Diagnostic Services laboratory, situated in Stellenbosch was responsible for accreditation of the new facility. As stated by the representative of Stellenbosch laboratory met by the audit team:

- Prior to the accreditation the equipment, status of the laboratory, maintenance of the equipment, traceability as well as the relevant educational background and capability of the personnel was checked;
- PROTEIOS INTERNATIONAL Laboratory was provided with the procedures for CBS analyses and with the control material;
- Samples were sent to the PROTEIOS INTERNATIONAL, Laboratory in Pietermaritzburg in order to verify the ability to identify CBS;
- No proficiency test has been carried out yet to check the ability of laboratories involved in CBS analyses.

Conclusions

The official examinations are carried out by the NPPO laboratory, which also have a coordinating role for the three laboratories authorized to carry out examinations for harmful organisms for export purposes. For exports to the EU, this is in line with Article 2(1)(i) of Council Directive 2000/29/EC.

5.2 PHYTOSANITARY STATUS

Legal basis

Annex I Part A Section I and Annex II Part A Section I to Council Directive 2000/29/EC list those harmful organisms that are not known to occur in the Community and whose introduction and movement within the Community is banned. These organisms include CBS and non-European Tephritidae (fruit flies).

In addition, Points 16(4) and 16 (5) of Annex IV Part A Section I to Directive 2000/29/EC establishes specific requirements, with respect to CBS and fruit flies, which must be met in order for Citrus fruits to be exported to the European Union. These vary, depending on the status of the relevant diseases in the country of origin.

Commission Decision 2006/473/EC recognise South Africa as being free from *Xanthomonas campestris* (all strains pathogenic to Citrus) and *Cercospora angolensis*. The same Decision recognises the following areas of South Africa as being free from *G. citricarpa* (all strains pathogenic to Citrus): Western Cape, Northern Cape: magisterial districts of Hartswater and Warrenton.

ISPM 4 details the requirements for the establishment of PFAs. In particular, Section 1.2 includes the three components in establishing and maintaining a PFA: systems to establish freedom (surveys and general surveillance), phytosanitary measures to maintain freedom, and checks to verify freedom has been maintained.

ISPM 6 establishes guidelines for surveillance.

ISPM 8 describes the use of pest records and other information in the determination of pest status in an area.

5.2.1 Surveys and general surveillance

5.2.1.1 Citrus black spot

Findings

CBS has a wide distribution in the eastern and southern areas of South Africa, which both experience summer rains. A number of historic records relating to the distribution of CBS have been found to be inaccurate due to confusion between the (similar) symptoms caused by *G. citricarpa* and those caused by *Guignardia mangiferae*. Following survey and testing (see below) the distribution of CBS has been found to be more restricted than previously reported. Therefore it was decided by the NPPO, based on a general preliminary survey, to carry out a specific survey according to the requirements of ISPM 4 and opt for recognition of these areas as PFAs for CBS. These have confirmed that, in addition to the PFA recognised by Decision 2006/473/EC, CBS has not been found in the whole of the Northern Cape, the magisterial districts immediately adjacent to the eastern border of the Western Cape, the western part of the Free State Province and the southern part of the North West Province. Further details on the survey and results can be found in section 5.2.2. and 5.2.3.

Apart from CBS infested and CBS free areas the NPPO informed the mission team that they have determined an area of low pest prevalence in the northern Limpopo region. The area was identified as a potential area of low pest prevalence for CBS because of its exceptionally hot and arid climate, which climatological studies have shown to be unsuitable for the establishment of CBS. Detection inspections and surveys were conducted over three growing seasons (2001-2003) to determine the presence and abundance of *Guignardia* spp. This included laboratory examination of and spore trapping from fallen leaves that had been lying in fields of production for more than 35 days. Based on the results of these investigations and the fact that no symptoms of CBS were found on Citrus fruit in commercial fields of production, the area was found to qualify as an area of low pest prevalence for CBS.

Further information on the symptoms caused by CBS in the SA climatic conditions can be found in the 2009 report.

Conclusions

The status of CBS in South Africa has been determined following detailed surveys and general surveillance, in line with ISPM 4 (Section 1.2). The specific survey results indicate that the PFAs for CBS are larger than currently recognised by Commission Decision 2006/473/EC.

5.2.1.2 Tephritidae

Findings

The most commonly found fruit flies as already stated in 2009 report are: Mediterranean fruit fly (*Ceratitis capitata*) and Natal fruit fly (*Ceratitis rosa*) which are kept under control with regular population monitoring and adjusted regular treatments. Since the establishment of *Bactrocera invadens* in northern Namibia and Mozambique as well as in the territories of several other African trading partners, a network of fruit fly traps was deployed as an early warning system to detect exotic fruit flies. A contingency plan was also put in place in order to enable action to be taken if any outbreaks are found. Traps were placed in production areas, alongside road transects at ports of entry and in urban areas close to municipal garbage dumps, hotels, sports grounds and other

strategic places countrywide. Surveillance was intensified especially alongside the northern borders of South Africa. The NPPO indicated that it had reported on the International Phytosanitary Portal of the IPPC the first detection in South Africa of *B. invadens* on 5 May 2010, at Weipe, close to the border with Zimbabwe, in a Methyl Eugenol baited fruit fly trap. On 21 May 2010 and subsequently, on 15 July 2010 exotic fruit fly specimens were detected in Methyl Eugenol baited fruit fly traps near to Groblersbrug, which is close to the border with Botswana. The fruit fly specimens were subsequently identified as *Bactrocera invadens*. Restriction on movements of fruits and relevant eradication measures were implemented and the NPPO stated that the measures have been successful and that there have been no further detections.

Conclusions

The status of fruit flies within South Africa has been established through a population monitoring programme. No PFAs have been established for these organisms; however producers are able to maintain effective control, which reduces the likelihood of interceptions by Member States of these organisms.

Following the establishment of *Bactrocera invadens* in neighbouring Namibia and Mozambique the NPPO established an intensive monitoring programme for early detection of *Bactrocera invadens*. and took immediate eradication measures upon identification of the harmful organism to restore the pest free status.

5.2.1.3 Other harmful organisms of Citrus

Findings

False Codling Moth (FCM - *Thaumatotibia leucotreta* previously known as *Cryptophlebia leucotreta* (Komai 1999)) is a significant pest of fruit trees and field crops in South Africa. The moth infests a broad range of crops including citrus fruit. All stages of citrus and stone fruits are vulnerable to attack. FCM larvae are capable of developing in hard green fruit before control measures can be started. Once a fruit is damaged, it becomes vulnerable to fungal organisms and scavengers. Control of this insect is complicated as it is a cryptic (i.e. non-obvious) pest, in that the moth lays one or a few eggs on the surface of the orange. On hatching, the larvae very quickly burrow into the orange and are then essentially inaccessible. There is thus a very small window of opportunity between hatching and burrowing. However mechanical, chemical and biological control methods are applied. The fruits out of season are removed after the harvest; as a chemical control is applied between September and December. In addition, as a biological control a baculovirus was developed for control of FCM in South Africa.

The status of both Citrus canker (*X. campestris* pv. *citri* (*Xanthomonas axonopodis* pv. *citri*)) and Fruit spot (*Cercospora angolensis* (*Phaeoramularia angolensis*)) has not changed since the last mission and are both stated to be 'absent - known not to occur'. Both of these organisms are quarantine pests for South Africa and additional requirements are attached to the import of fruit from countries where the diseases are known to occur.

Conclusions

False Codling Moth *Thaumatotibia leucotreta* is widely present in South Africa and control measures are applied in citrus production areas.

The status of both *X. campestris* pv. *citri* and *C. angolensis* has been determined in-line with the

relevant ISPMs. Both are known not to occur in South Africa, in line with Commission Decision 2006/473/EC.

5.2.2 Checks to verify freedom of pest free areas

Findings

In the 2009 report the NPPO was recommended to:

Consider submitting a request, that those areas recognised by South Africa as pest free areas for G. citricarpa, following systematic surveys, are also recognised by Commission Decision 2006/473/EC as such.

A request for the recognition of the Northern Cape as being free from CBS was submitted to the Commission in May 2011, together with a detailed dossier on the surveys and control measures in place for CBS. The production area of Northern Cape is located in the part of the Kalahari desert by the Orange river where, based on irrigation in the distance up to 15 km, new plantations are under development. The area defined is much wider than the actual production area but the proposed PFA is based on the political boundaries of magisterial districts in order to assure better control of movement of planting material. The major part of the area serves as a buffer zone since due to the desert climate there is no production.

Based on the same documentation the area has already been recognized as PFA for CBS by the USA, Department of Agriculture as stated by the NPPO.

Preliminary detection surveys were carried out in 2002 and 2003 to determine the status of CBS in the Northern Cape and Free State Province.

Following completion of these surveys, specific CBS surveys were also carried out in Northern Cape, Western Free State and Southern North West Provinces in 2005/2006.

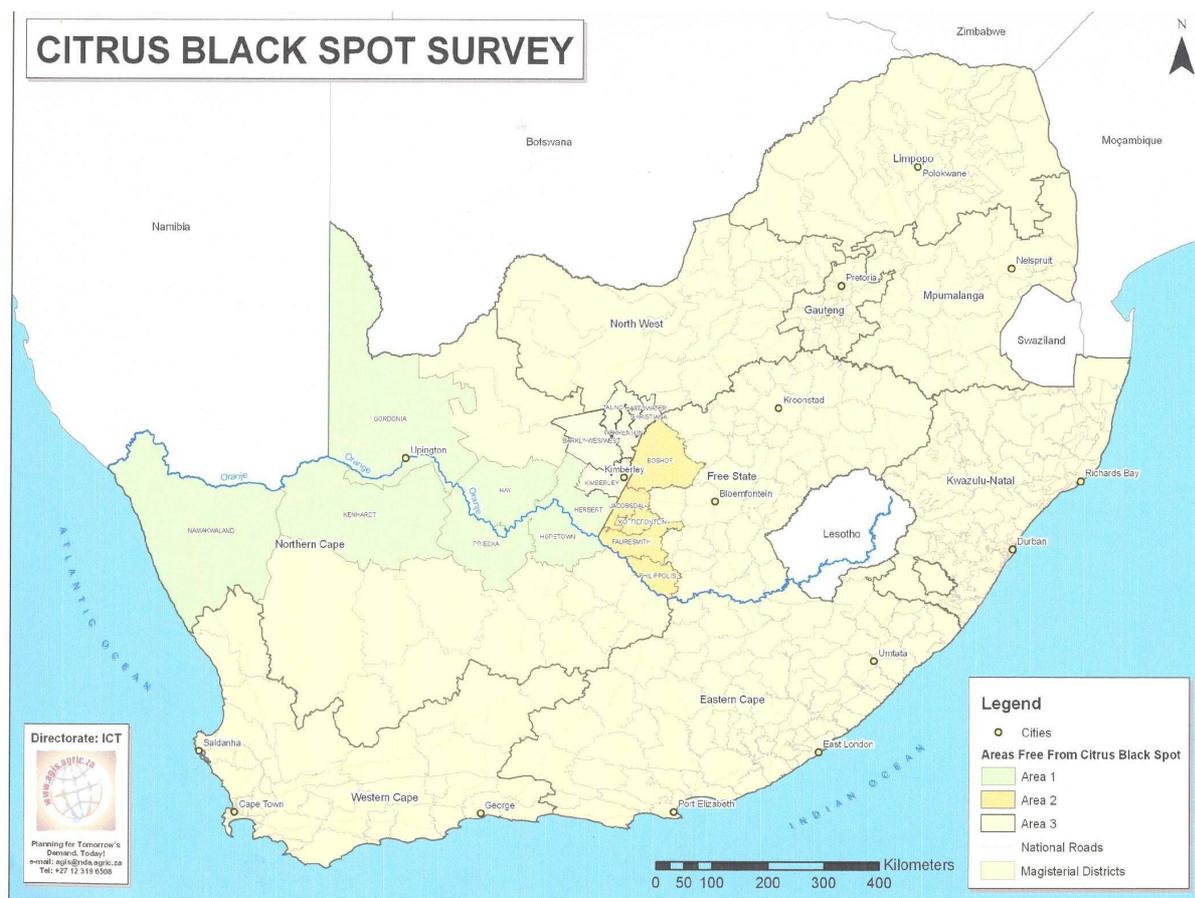
The area surveyed as indicated on the Map 1 below, and includes the following magisterial districts:

Area 1: The Northern Cape - comprising the magisterial districts of Herbert, Hopetown, Hay, Prieska, Gordonia, Kenhardt and Namaqualand.

Area 2: The western Free State – comprising the magisterial districts of Philippolis, Fauresmith, Koffiefontein, Jacobsdal and Boshof.

Area 3: Comprising the magisterial districts of Kimberley and Barkly West in the Northern Cape and Taung and Christiana in the North West. (with exception of districts of Hartswater and Warrenton as they already have CBS free status).

Map 1: Areas included in the survey for recognition as PFA for CBS



The specific survey was divided into two phases. During the winter months of June and July 2005 mature citrus fruit were sampled from trees in the targeted areas of the survey and were visually inspected and analyzed for any CBS lesions or related symptoms. 3-5 fruit are collected per tree in private gardens and in orchards 3-4 fruits per 2 ha. Fruit were then incubated at 23 - 25°C and a high light intensity to stimulate the development of CBS, should the pathogen be present. If any fruit with suspect lesions are found, these lesions are cultured specifically for *Guignardia* and subjected to Polymerase Chain Reaction (PCR) analysis for *G. Citricarpa*.

During the summer months of November 2005 to January 2006, fallen leaves were collected from the same sites previously visited and the leaves were analyzed for the presence of *G. citricarpa* spores. A minimum of 300 dry (at least one month old) leaves are taken from each sampling point. Leaf samples are analysed using the Kotze Inoculum Method. If *Guignardia*-type spores are found the leaf samples are subjected to a PCR-based diagnostic protocol to determine the presence of *G. Citricarpa*.

A total of 450 sample sites were monitored in winter (June –July) on fruits and also in summer (November-January) on leaves selecting and prioritising trees of the CBS-sensitive cultivars, lemon and valencia orange, older than 15 years. There were 150 sample sites chosen in each of the three target areas by highly qualified laboratory and DAFF staff. Home garden trees and commercial orchards were included in the survey. In the areas surveyed, many samples were from home garden/back yard trees, as there are only a few orchards currently established in these districts and in many cases the trees are very young. Where lemons and valencia oranges were not available,

rough lemon, navel and grapefruit trees were inspected and sampled.

No visual symptoms of CBS were observed during June - July 2005 throughout the areas surveyed and no fruit was found with CBS symptoms. The fallen leaves from all 450 sites sampled during November 2005 until January 2006 tested negative for *G. citricarpa* spores.

Based on the findings of the specific survey it was concluded that CBS does not occur in the areas concerned.

The FVO team visited the Northern Cape and noted that:

- The majority of the orchards are located near the banks of the Orange River which is surrounded with hundreds of kilometres of savannah. Apart from the orchards, occasional host plants could only be found in the gardens in cities;
- The survey and sampling were carried out by highly qualified persons from Laboratories and DAFF.

5.2.3 Measures to maintain freedom of pest free areas

Findings

Recommendation number 4 of the 2009 report stated the following:

*Consider requiring, at least for places of production exporting to the EU, that all suspected occurrences of *G. citricarpa* should be reported to the official services.*

In their response linked to the PFA the NPPO stated:

After the FVO mission to SA (15-26/06/09), specifically the visit to the Western Cape CBS free area, PPECB ensured that its inspectors in the CBS PFAs were provided with the necessary CBS identification materials and CBS related procedures. In addition, DAFF and PPECB will intensify CBS training for all Citrus inspectors before the 2010 Citrus export season starts;

*For the 2010 export season, an instruction will be issued that as a condition of retaining phytosanitary registration and approval status for export of Citrus to the EU, any occurrence of *Guignardia citricarpa* Kiely in a PUC registered for export to the EU shall be notified to the NPPOZA and the implicated field of production/ citrus fruit type/ PUC combination, as relevant, will be withdrawn from the export programme;*

A regulation will be promulgated regarding mandatory notification and submission of a sample to NPPOZA for official testing if CBS is suspected in any CBS Pest Free Area or Area of Low Pest Prevalence (ALPP) for CBS in SA. Through the Early Warnings unit for phytosanitary pests this will trigger an appropriate delimiting survey in the relevant area followed by control measures and legislative amendment as well as notification to trading partners and to the IPPC through the NPPOZA national plant protection contact point.

CBS is a regulated non-quarantine pest on plant propagation material, based on the Agricultural Pests Act, 1983 (Act No. 36 of 1983), and Control Measures R. 110 of 27 January 1984 -Restriction on the movement of citrus propagating material within South Africa. A scheme for the production of disease free plants has been established and a permit is required for the movement of *Citrus* plants within South Africa. A foundation block, providing seed and bud-wood for further propagation has been established in the Eastern Cape. All propagating material imported and produced has to go through the national certification system and are checked and certified by CRI. If plants are sold a CRI certificate has to accompany the plants as an evidence of certified origin and regular supervision. During checks of nurseries the quantities are verified via invoices and certificates are issued and provided by CRI.

No restriction of fruit is applied as it is believed that the fruits are not pathway for CBS. However the likelihood of fruits to be transported from infested areas is very limited, and in particular into the Northern Cape due to large distances involved and all points of exit being situated in the south and west of the country.

Checks to verify that the freedom had been maintained are mainly done via the export inspections during production and packing and field inspections by the CRI and IS. If suspicious symptoms of possible CBS infestation are noted samples would be taken. A positive laboratory result would trigger a new delimiting survey and the status of the area would need to be redefined. A suspicion of CBS presence should immediately be notified to DAFF.

It was stated by the NPPO that the requirement on obligatory and immediate notification of every suspicion has been passed to every inspector however the relevant legislation was not issued.

The FVO team visited the Northern Cape and noted that:

- The producers met were aware of the CBS and the restriction on movement of planting material. They stated that in order to participate in a Private Standard System it is a requirement to use certified material for planting as stated by producer;
- The pack-houses receive fruits from the producers in the immediate vicinity only. Many pack-houses are part of a cooperative and process fruit from a number of producers;
- The PPECB inspector at the pack-house was aware of the internal interception system (for further details see section 5.5.1.) when following a finding of CBS symptoms a field of production is excluded from export and put on the Alert list but he believed that it is an annually updated list. However he stated that any suspicion of CBS presence should immediately be conveyed to PPECB and DAFF for follow up and possible revision of the PFA status but there has not yet been any suspected detection of CBS in the area in question³;
- The producers met by the mission team stated that all plants are obtained from a nursery situated within the Northern Cape. The audit team visited a nursery; the producer stated that

3 In their response to the draft report the Competent Authority noted that the concern was immediately addressed and rectified with the relevant PPECB inspector by DAFF IS. The matter was also followed up with the PPECB by DAFF DPH and IS to make sure that the latest version of the Alert List is circulated to all inspectors at all times. This bullet point also addresses the concern expressed in the bullet point one in section 5.3.3.

propagation material is obtained from the CRIs Foundation block. The CRI issues a certificate to accompany plants when they are sold;

- The growing conditions and treatment regime for such material and the documentation were appropriate at the nursery visited.

The FVO team also visited a garden centre in Free State Province, situated just outside the proposed PFA and noted that the DAFF inspector and the garden centre manager met were aware that there are restrictions on the movement of citrus plants, however they were not familiar with the geographical limits⁴.

The areas recognized as free from CBS by Commission Decision 2006/473/EC were visited during the 2009 mission. They have not been revisited in 2011. However, it was noted by the FVO team that the restriction on movement of planting material does not correspond with the recognized PFA in every case and therefore a movement of planting material from infested areas to some of the recognized PFA in Western Cape is possible even though they are of minor importance for citrus production.

Conclusions:

The status of CBS in South Africa has been determined following detailed specific surveys and general surveillance carried out in period of 2002-2006, in line with ISPM 4 (Section 1.2) and the report was submitted to the Commission in May 2011. Checks are carried out to verify the continued freedom from CBS in the PFAs in line with ISPM 4 (section 1.2). Regulatory actions are in place to prevent movement of citrus planting material from infested to PFAs of SA. These measures are in line with ISPM 4 (Section 1.2.2.). However the regulation on mandatory notification and sampling was not promulgated yet. In addition some shortcomings were noted in the awareness linked to the movement and listing of production fields excluded from export to EU (Alert list) in the new PFA.

5.3 EXPORT PROCEDURES, REGISTRATION AND TRACEABILITY OF CONSIGNMENTS

Legal basis

Section 4.5 of ISPM 7 establishes that consignments and their certification should be traceable as appropriate through all stages of production, handling and transport to the point of exit.

Point 16(4) of Annex IV Part A Section I to Directive 2000/29/EC establishes specific requirements, with respect to CBS, which must be met in order for fruits of *Citrus*, *Fortunella*, *Poncirus* and their hybrids, other than fruits of *Citrus aurantium*, to be exported to the EU.

4 *In their response to the draft report the Competent Authority noted that the concern is noted and DAFF will ensure that awareness is strengthened to all nursery owners to make them aware of the official Control Measures that regulate the movement of citrus propagation material/citrus plants from CBS infected areas to non-infected/PFA areas and to familiarise them with the geographical limits.*

5.3.1 General export procedures

Findings

All producers intending to produce and export citrus fruits, as well as the pack-houses, must first register with the Directorate Food Safety and Quality Assurance and DPH. Registration is given after an inspection by IS. Registered production units are subject to certain conditions, including compliance with the CRI production guidelines for CBS and the establishment of procedures to enable fruit to be traced back to the unit of production.

5.3.2 Registration

Findings

The registration procedure of all Food Business Operators involved in the handling of fruits for export including production units, pack-houses, inspection points, exporters, cold stores, container depots, transport operators, processing plants, and sea port terminals is described in the 2009-8184 report. They are registered with the Directorate Food Safety and Quality Assurance which assigns and approves individual Production Unit Codes (PUCs) and Pack-house Codes (PHCs).

As stated by the competent authority, a registration down to the field level (units within one PUC), mainly considered to be an orchard with one variety has been introduced in 2011 on voluntary basis and from 2012 obligatory; giving time in this way to the producers to adapt their IT systems to the new registration and traceability requirements.

Conclusions

There is a detailed registration procedure in place, which should ensure that fruit is only exported to the EU, from units of production under the export control system and will be strengthened by refining the registration of the smallest production unit (field within PUC).

5.3.3 Documentation and traceability of consignments

Findings

Recommendation number 3 of the 2009 report stated that:

Ensure that APIS inspectors have access to an up-to-date list of units/places of production excluded from exporting to the EU, in order that they can verify that the fruit intended for export complies in particular with Point 16(4)(d) of Annex IV Part A Section I to Council Directive 2000/29/EC.

The traceability system is described in the 2009-8184 report.

Following processing and packing, each carton is marked, with a barcode label, which includes details of the PUC, variety and packing date as well as the country of origin. The DPH informed the FVO team that it is important that in case of an interception Member States include as much detail from this label as possible in order for them to accurately trace and take action against the correct PUC or place of production (see section 5.5.2 below).

If CBS symptoms are noted, the consignment is diverted to CBS non sensitive markets and the boxes are marked with a specific code, to make clear for all FBO that it is not eligible for EU

markets. The relevant orchard is excluded for the whole season from export to EU according to the system described in section 5.5.1.

The FVO team noted that:

- All of the pack-houses visited were registered and accredited to a number of Good Agricultural Practice schemes and various supermarket quality standards. The documentation required for these standards was sufficient to enable the origin of all fruit to be traced back to the PUC;
- The PPECB inspectors did not all have an up-to date national Alert list on site. However, the consignment is repeatedly checked against the national Alert list at the point of exit when PC are issued in order to avoid unwarranted export;
- All producers and pack-house managers met by the FVO team were aware of the traceability requirement and followed the system;
- All FBO and inspectors were familiar with the code system of diverted goods not eligible for export to EU;
- The inspection records and results of DAFF inspectors were not available at all of the production sites visited. In these cases, the officials stated that inspection records are left only in the event that problems are found.

There is a regular rotation of inspectors to avoid any possible conflict of interest.

Conclusions

The consignments are traceable through all stages of production, handling and transport to the point of exit. The lack of inspection records and up to date Alert list on every control site could compromise the system. The NPPO committed themselves to introduce the obligation of issuing a copy of inspection records to producers. The risk linked to lack of up-to date Alert list is mitigated by subsequent check at the exit point, however, recommendation number 3 has not been fully addressed.

5.4 EXPORT CHECKS

Legal basis

Points 16(4) and 16 (5) of Annex IV Part A Section I to Directive 2000/29/EC establishes the specific requirements, with respect to CBS and fruit flies, which must be met in order for fruits of *Citrus*, *Fortunella*, *Poncirus* and their hybrids (with the exception, for Point 16(4) of *Citrus aurantium*), to be exported to the EU.

ISPM 23 establishes guidelines for inspection.

ISPM 31 establishes methodologies for sampling of consignments.

5.4.1 General system

Findings

The first part of the recommendation number 1 of the 2009 report stated the following:

Ensure that for Citrus fruit exported to the EU, originating outside of the pest free areas recognised

*by Commission Directive 2006/473/EC, that it originates in a field of production subjected to appropriate treatments against *Guignardia citricarpa* and that none of the fruit harvested in the field of production has shown, in appropriate official examinations, symptoms of *G. citricarpa*, in-line with Point 16(4)(d) of Annex IV Part A Section I to Council Directive 2000/29/EC.*

The system of export controls applied depends on the importing country's requirements. In South Africa, any export market which requires the implementation of specific phytosanitary measures and therefore for which phytosanitary registration, inspection and approval is required, is termed a 'special market'. Export markets for which CBS is a quarantine pest are further distinguished from those for which CBS is not a quarantine pest. The former are referred to as 'CBS sensitive markets'. The EU is a special market and a CBS sensitive market. Other special markets for citrus (not all of which are CBS sensitive markets) include Japan, China, USA and South Korea. Additional checks are carried out for the export of fruit to special markets as already described in 2009 report. Growers producing fruit for other special markets also often export to the EU.

The general system of export control for EU is in the form of official checks carried out on fruit once it has been harvested, processed and packed. This check is done by the PPECB. Official checks are not systematically carried out in the place of production, or at the point of exit, for fruit destined to the EU except Spain (see section 5.5.2.).

5.4.2 Field of production

Findings

Recommendation No. 4 of the 2009 report stated the following:

*Consider requiring, at least for places of production exporting to the EU, that all suspected occurrences of *G. citricarpa* should be reported to the official services.*

Inspections of the field of production are only routinely carried out for fruit destined to certain other special/CBS sensitive markets, but not for the EU. The NPPO informed the FVO team that approximately 300 production units are inspected annually by IS in order to comply with the import requirements for those markets, and that these places of production also supply fruit to the EU. Production units and packing houses in high risk areas and those on the Alert list are visited by DAFF inspectors during the growing season to determine the occurrence of CBS in production orchards. Should any CBS symptoms be detected and identification of *Guignardia citricarpa* be confirmed, the producer is informed that fruit harvested from the specific orchard/s may not be exported to the EU Member States. A number of sites are also visited for audit purposes as well.

The FVO team noted that:

- All of the producers met by the FVO team were aware of the EU requirements regarding CBS and fruit flies;
- The producers met stated that if they found symptoms of CBS in the production unit, the fruit would be diverted to a non-CBS sensitive market;
- The producers had all applied the CRI guidelines, and all reported that they had attended and discussed CBS in the monthly study groups held in their region by the CRI. Growers are advised by the CRI to implement a combination of chemical and physical controls to control CBS. Samples for resistance against Benzimidazole fungicides are taken and analyzed by CRI;

- All the producers met have contracts with consultants and some of them had plant pathologist employed;
- The orchards are weekly inspected by so called scouts (employees of the company) and the records of noted harmful organisms or symptoms are checked during random inspections of DAFF inspectors. However, there is no requirement to inform the DAFF or PPECB in case CBS symptoms were noted on the field of production. It is up to the producer to divert the goods from infested fields to CBS non sensitive markets.

For fruit flies, the CRI recommends a control strategy based on a population monitoring programme and weekly preventative treatments based on CRI guidelines which implementation is obligatory for all producers. Further information on field controls can be found in the previous report.

5.4.3 Pack Houses

Findings

Recommendation number 2 in the 2009 report stated:

*Ensure that the action taken following a finding of *Guignardia citricarpa* during the pre-export inspection is such as to ensure that exported fruit complies with Point 16(4) (d) of Annex IV Part A Section I to Council Directive 2000/29/EC.*

The fruit exported to the EU is inspected in the pack-houses by the PPECB, immediately after processing and packing and not at the intake. The fruit is sampled on a pallet basis and the sample is inspected for both quality and plant health purposes. A zero tolerance is applied for CBS and fruit flies. If CBS or fruit fly is found the Quality Assurance certificate that is issued by the PPECB, indicates “not for CBS sensitive markets” and a code is placed with the same meaning on the boxes, to ensure that the fruit may not be exported to such markets. All the fruits originating from the same orchard are automatically diverted to non sensitive market. And the PUC is put on the Alert list (see also section 5.5.1)

The FVO team noted that:

- Before the inspection commences the PPECB inspector verify that the PUC is eligible to export to the intended market by checking against the national list of suspended PUCs (Alert list);
- The sampling and inspection procedures have not changed since the last mission;
- All pack-houses visited were equipped with modern processing and packing equipment. The movement and processing of fruit was recorded on computer databases;
- That fruits from different orchards were packed separately with a break and cleaning in-between;
- The boxes on each pallet were clearly labelled with the PUC registration number, PHC registration number, packing date, bar-code labels and more and more producers include the orchard number as well;

- At the premises visited, all fruit was treated with sodium hypochlorate (200 ppm for 2 minutes), and two fungicides before being waxed;
- Each of the visited pack-houses had at least one PPECB inspector, who worked in a dedicated, well equipped inspection room. The majority of inspectors met informed the FVO team that they do not carry out regular inspections on the line, on eliminated fruits or at intake of fruit at the pack-house;
- PPECB inspectors had been trained to conduct such inspections and had been provided with detailed quality standards, including pictures of disease symptoms. All appeared to be familiar with CBS;
- Following the completion of inspection, the results were recorded on the quality assurance certificate and then a PPECB sticker, each with a unique serial number, was attached to at least one carton on each side of the pallet, to indicate that it had been inspected.

5.4.4 *Point of exit*

Findings

The system of PC issue is the same as described in 2009 report.

In cases where the PPECB inspection was carried out 28 days or more prior to export (for hard citrus) or 22 days or more (for soft citrus/easy peelers) for fruit in cold stores, each lot must be re-inspected by IS inspectors at the ports of exit, while PPECB also conduct a new quality assurance inspection. IS inspects all fruit lots that are destined for special markets. In addition all consignments destined to Spain are re-inspected for presence of FCM based on interceptions notified in EUROPHYT by Spain (see also section 5.5.2.).

The FVO team visited Durban port and noted that:

- All the goods at arrival are registered in the system, sorted and moved based on the bar code identification of each box;
- There is an automatic system of notification in the port if the goods need to be re-inspected either because they are intended for destined for special markets, intended to be exported to Spain or the validity of export inspection expired;
- The port manager met was aware of the code system of diverted consignments due to CBS presence that are not eligible to be exported to the EU and stated that even if requested by exporter it could not be allowed for EU market but it has not happened;
- If a consignment stored at the port originating from an orchard found to be infested with CBS at a later stage, and notified it can be easily identified and diverted to CBS non sensitive market as stated by NPPO.

Conclusions

The general system of export controls for citrus fruit exported to the EU is based on the application of treatments against CBS in non PFAs and fruit flies in the field of production and an inspection immediately after processing and packing of the fruit. It is supplemented by field inspections in case of high risk areas.

The whole system of export checks has been improved and strengthened since the 2009 mission and reduces significantly the risk of introduction of CBS. All fruits originating from the same orchard found to be infested are now excluded from export to EU and therefore second part of the recommendation number 1 and the recommendation number 2 have been addressed.

However, the official checks are carried out on a representative sample of all *Citrus* fruit intended for export to the EU following processing and packing and at the time of intake on all fruit harvested and this is not fully in line with EU requirements for fruit originating outside of the PFAs recognised by Commission Decision 2006/473/EC and therefore the first part of the recommendation number 1 has technically not been addressed.

The regulation on obligatory notification of any CBS to NPPO has not been adapted yet therefore the recommendation number 4 has not been fully addressed.

5.5 ACTION TAKEN IN RESPONSE TO INTERNAL INTERCEPTIONS AND THOSE REPORTED BY EU MEMBER STATES

Legal basis

ISPM 23, Section 2.6 (Review of inspection systems) establishes that NPPOs should conduct periodic reviews of import and export inspection systems to validate the appropriateness of their design and to determine any course of adjustments needed to ensure that they are technically sound.

ISPM 7, Section 6.2. (Incident review) requires that the NPPO establish procedures for investigating reports from importing countries of non-conforming consignments covered by a phytosanitary certificate.

Items 16(4) and 16(5) of Annex IV Part A Section I to Council Directive 2000/29/EC establish the special requirements for the introduction of Citrus fruits, with respect to CBS and non-European Tephritidae.

5.5.1 Action taken in response to internal interceptions

Findings

Second part of the recommendation number 1 in the 2009 report stated the following:

Following a finding of G. citricarpa, all Citrus fruit originating in the same field be excluded from export to the EU.

The DAFF in cooperation with various stakeholders has improved the CBS risk management system for citrus exports to CBS sensitive and special markets since the previous mission, including a strengthening of the action taken in the event that CBS is found. If CBS is found during the PPECB inspection in pack-houses, then action according to the new system are taken as follows:

- If any sign of CBS is found on fruits the relevant field (orchard) is considered to be infested and all the fruits originating from the same field are automatically diverted to the local market and/or CBS non sensitive markets. The orchard is suspended for the whole season and the PUC relevant to the orchard is put on the Alert list within 24 hours. The PPECB inspector is required to communicate the details to the DAFF DPH unit for inclusion on the national Alert list;
- If there are 3 findings from the same PU no further exports to the EU of the same type of citrus are permitted and in case of four interceptions the whole PU is suspended from exporting to the EU for all citrus type;
- The NPPO stated that fruit types are considered separately since different control measures may be applied and there are significant differences in susceptibility to CBS between fruit types and therefore the level of risk associated with one fruit type from a particular source is not considered by the NPPO to be a valid indication of the risk associated with another fruit type from the same PU;
- Following the initial training the PPECB inspector is considered to be competent for CBS decisions based on visual symptoms if three consecutive samples taken for CBS prove to be positive based on laboratory results. Samples are in general taken only in case of dispute, when the pack-house manager disagrees with the judgement of the PPECB inspector. The goods from the field in question are then put on hold pending the laboratory results;
- Disqualified PUCs may be reinstated in the next season only following an on-site evaluation by a registered technical expert, who has to determine whether the producer has applied the CRI guidelines correctly and the reasons for the original presence of CBS. The technical experts are usually independent consultants;
- In the majority of cases, as stated by the NPPO, it is difficult to identify the shortcomings that resulted in CBS being present, however, it is usually due to poorly timed pesticide application and/or weather conditions following the application;
- Following an interception, the relevant variety/PUC on the consignment note is endorsed 'Black spot found not for EU' and a specific code is put on the boxes. This is intended to prevent a consignment with CBS being diverted into a CBS sensitive market prior to the export and the target market code, which is included on each pallet are to prevent a consignment with CBS being diverted into a CBS sensitive market after it has left South Africa.

The target market codes used by exporters are: AF (Africa), CA (Canada), ME (Middle East), FE (Far East), RS (Russia) and NI (China, Taiwan and Korea). Following a notification of finding of CBS, the second letter of the target market code on the pallets and accompanying documents is changed to '8'. (for example, Middle East is coded as ME - if CBS is found, the destination code is changed to 'M8' to indicate that the fruit cannot be sent to a CBS sensitive market). In case of FCM finding a code '7' is used and for goods infested with both harmful organisms a code '9' is applied.

During the visits the FVO team noted that:

- In one of the PUCs that had been disqualified from export to the EU and subsequently reinstated the independent technical experts and DAFF inspectors concluded that the tank filled with water used for processing the fruits was not cleaned up between the reception of fruits from different orchards and therefore the remaining fruits in the tank from the

previously processed orchard were mixed up with the following lot originating from another orchard. The fruits from the first orchard were destined for a local market as the orchard was already during the production season found to be infested with CBS;

- IS and the CRI had provided information to producers on the changes in the interception system and zero tolerance for CBS in case of EU market and the producers met were aware of the new policy.

Conclusions

The NPPO ensures that action is taken following an internal and EU interception. The measures taken following a finding have been reviewed and strengthened. All fruits from the same field of production are excluded based on the new system from the export in case of finding and internal interception of CBS therefore the second part of the recommendation No. 1 has been addressed.

5.5.2 Action taken in response to notifications of interception by EU Member States

Findings

The DPH National Plant Protection Contact Point receives and disseminates all notifications of non-compliance from the EU.

The NPPO informed the mission team that when notifications of non-compliance are received, they are sent to IS, which in turn notifies the relevant industry associations, including the CGA and FPEF. The CGA and FPEF then inform its members. Corrective actions that are implemented are communicated back to IS. Records of all relevant communication between DPH, IS and industry associations are kept in DPH and IS registries as already described in 2009-8184 report.

The NPPO stated that action is always taken following receipt of a notification of interception from the EU is received as detailed in the previous section. The NPPO informed the FVO team that it was difficult to take such measures because the information provided by the EU Member States in the form of EUROPHYT notification does not normally include the specific PUC of the intercepted fruit. Since one phytosanitary certificate normally covers many PUCs, it is not possible to suspend all PUCs. The NPPO has requested once again that Member States include the PUC code (which is indicated on every carton) in future notifications.

Following the high number of EUROPHYT notifications of interceptions, 21 in 2009, due to the presence of a non listed pest, False Codling Moth (FCM), *Thaumatotibia leucotreta* intercepted on citrus products originating from SA, which were reported mainly by Spain, the export control system has been upgraded. The PPECB inspection regime and CRI guidelines for producers have been revised to include FCM. In addition, a second check is carried out at the point of exit (port) for consignments destined to Spain. As a consequence of the new stricter control measures the number of interceptions has dropped to 2 in 2010.

Conclusions:

The revised inspection regime in response to FCM interceptions resulted in significantly reduced number of interceptions. The NPPO responded to EU interceptions and took measures as required by relevant International Standard. However, these measures in case of CBS interceptions were limited and compromised due to lack of information about the producer's registration number, PUC number that is placed for traceability reasons to every box but are rarely made available to the exporting country in case of interception on the EUROPHYT notification form.

6 OVERALL CONCLUSIONS

The general system of export controls for citrus fruit exported to the EU is based on the application of treatments against CBS and fruit flies in the field of production and an inspection immediately after processing and packing of the fruit. It is supplemented by field inspections in case of high risk areas.

The whole system of export checks has been improved and strengthened since the 2009 mission and reduces significantly the risk of introduction of CBS. All fruits originating from the same orchard found to be infested are now excluded from export to EU.

However, the official checks are carried out on a representative sample of all *Citrus* fruit intended for export to the EU following processing and packing and this is not fully in line with EU requirements for fruit originating outside of the PFAs recognised by Commission Decision 2006/473/EC.

The surveys and measures applied to the established and proposed PFAs for CBS were generally found to be in line with the relevant International Standards.

The National Plant Protection Organisation (NPPO) takes appropriate action following internal and EU interceptions, and has implemented changes in the control system for False Codling Moth.

7 CLOSING MEETING

At closing meeting was held on the 17 June 2011 at the Department of Agriculture, Forestry and Fisheries in Pretoria during which, the main findings and conclusions of the mission team were presented. The NPPO provisionally accepted the findings and conclusions and indicated a commitment to make further changes if necessary.

8 RECOMMENDATIONS

The competent authority in South Africa is recommended to:

N°.	Recommendation
1.	Ensure that in case of Citrus fruit exported to the EU, originating outside of the pest free areas recognised by Commission Directive 2006/473/EC, none of the fruit harvested in the field of production has shown, in appropriate official examinations, symptoms of <i>G. citricarpa</i> , in-line with Point 16(4)(d) of Annex IV Part A Section I to Council Directive 2000/29/EC.
2.	Ensure that IS and PPECB inspectors have access to up-to-date guidelines, instructions and list of units/places of production excluded from exporting to the EU, in order that they can verify that the fruit intended for export complies in particular with Point 16(4)(d) of Annex IV Part A Section I to Council Directive 2000/29/EC.
3.	Consider that a copy of the inspection reports is provided to the producers and pack-

N°.	Recommendation
	houses inspected to allow effective follow up .
4.	Notify the Commission when the national regulation regarding the mandatory notification on all suspected occurrences of <i>G. citricarpa</i> has been adapted in line with the commitment of the South Africa action plan of 2009 FVO report.

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/ap/ap_za_2011-6070.pdf

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 2000/29/EC	OJ L 169, 10.7.2000, p. 1-112	Council Directive 2000/29/EC of 8 May 2000 on protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community
Dec. 2006/473/EC	OJ L 187, 8.7.2006, p. 35-36	2006/473/EC: Commission Decision of 5 July 2006 recognising certain third countries and certain areas of third countries as being free from <i>Xanthomonas campestris</i> (all strains pathogenic to Citrus), <i>Cercospora angolensis</i> Carv. et Mendes and <i>Guignardia citricarpa</i> Kiely (all strains pathogenic to Citrus)

ANNEX 2 – STANDARDS QUOTED IN THE REPORT

International Standard	Title
ISPM No. 04	International Standard on Phytosanitary Measures Publication No 4, Requirements for the establishment of pest free areas, Food and Agriculture Organisation, Rome, February 1996
ISPM No. 05	International Standard on Phytosanitary Measures Publication No 5, Glossary of phytosanitary terms, Food and Agriculture Organisation, Rome, May 2010
ISPM No. 05 – Index	International Standard on Phytosanitary Measures Publication No 5, Glossary of phytosanitary terms: multilingual index of phytosanitary terms, Food and Agriculture Organisation, Rome, May 2010
ISPM No. 06	International Standard on Phytosanitary Measures Publication No 6, Guidelines for surveillance, Food and Agriculture Organisation, Rome, November 1997
ISPM No. 07	International Standard on Phytosanitary Measures Publication No 7, Export certification system , Food and Agriculture Organisation, Rome, November 1997
ISPM No. 08	International Standard on Phytosanitary Measures Publication No 8, Determination of pest status in an area, Food and Agriculture Organisation, Rome, November 1998
ISPM No. 12	International Standard on Phytosanitary Measures Publication No 12, Guidelines for phytosanitary certificates, Food and Agriculture Organisation, Rome, September 2001
ISPM No. 23	International Standard on Phytosanitary Measures Publication No 23, Guidelines for inspection, Food and Agriculture Organisation, Rome, April 2005
ISPM No. 31	International Standard on Phytosanitary Measures Publication No 31, Methodologies for sampling of consignments, Food and Agriculture Organisation, Rome, April 2008