

California Citrus Quality Council (CCQC) Quality Assurance Program

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As specifically provided for in the California Citrus Improvement Program marketing order, this ongoing Quality Assurance Program is conducted by the California Citrus Quality Council (CCQC) under an operating agreement with the California Citrus Research Board.

CCQC's mission is to represent the California citrus industry in response to problems and issues which arise in state, national, or international arenas and which affect the industry generally in areas of quarantine matters, technical assistance, food safety, international compliance, or other related issues. CCQC is pro-active and always maintains a science-based approach to the issues relating to the state's citrus industry.

The objective of the program is to furnish citrus growers and their shippers with technical information and procedural guidance to assure the marketing of citrus fruit that complies with the chemical residue, food safety, phytosanitary and labeling requirements of the U.S. and all importing countries.

REGISTRATION ACTIVITIES

. **2,4-D Isopropyl Ester and SOPP:** The CCQC data support program for registrations of citrus pesticides was greatly expanded in 1993 to save two chemicals essential to the California citrus industry. Registration was not supported by their manufacturers. Since then, CCQC generated and submitted data required for reregistration of two compounds, the growth regulator 2,4-D isopropyl ester (IPE) and the post-harvest fungicide SOPP/OPP, before both the U.S. EPA and the Codex Committee on Pesticide Residues (CCPR). Recently, South African citrus industry representatives bought the rights to cite CCQC's data for maintaining registrations of postharvest use of 2,4-D in the EU.

In the case of the Codex reviews, the Joint Meeting on Pesticide Residues (JMPR) recommended to the full CCPR Codex committee that a 1 ppm maximum residue levels (MRL) be proposed for 2,4-D on citrus, based on the data submitted by CCQC. The issue was reviewed at the April 2004 meeting of the CCPR and approved by the Codex Commission in June 2004.

A review of 2,4-D at EPA was completed in 2004 and a tolerance of 1 ppm for 2,4-D on citrus was maintained. Support will continue to be given by CCQC to maintain the postharvest use of 2,4-D.

The citrus fruit MRL for SOPP has been reviewed by the CCPR committee. The 10 ppm level current in Codex was maintained. CCQC has coordinated the efforts of our contractor at the JMPR and will respond to questions raised at the national or international levels as appropriate. The tolerances for SOPP are under review by the EU this year. We have been contacted by the registrant Dow based on interest in utilizing our data for supporting citrus tolerances in the EU.

. **Thiabendazole and Imazalil:** Both these post-harvest fungicides have completed their review by EPA with little to no change for citrus labeled uses.

. **Hydrogen Cyanide:** Sodium cyanide treatments, which result in residues, are used to fumigate citrus bound for Arizona to control red scale. As interest in expanding the use of this material for other export markets for post-harvest quarantine programs continues, CCQC will be involved in working with regulators as use of this chemical is reviewed.

GENERAL ISSUES

. **Citrus Pesticide Data:** Passage of the Food Quality Protection Act (FQPA) led CCQC to commission the production of a citrus industry crop profile to reflect pest management priorities in each of the four main production areas. CCQC worked with scientists and industry representatives to update key elements of the crop profile to more accurately reflect current pesticide use patterns. Although prior crop profile was based on 1996 use data, the new 2003 crop profile used the latest 2001 California statistics on pesticide use.

A Pest Management Strategy Plan (PMSP) was generated for the California citrus crops. CCQC provided pesticide-specific extracts from the PMSP to regulatory agencies including the U.S. EPA for making pesticide registration decisions and the Department of Agriculture for pest and disease management research funding decisions based on accurate timely information.

. **Commodity Coalitions:** Coalitions have become crucial to California citrus during the implementation of the Food Quality Protection Act (FQPA). Through representation on the Minor Crops Farmer Alliance (MCFA) Executive Committee and in the role of Chairman of the International Subcommittee of MCFA, CCQC continues to provide California citrus industry's valuable input into EPA during the implementation of the FQPA.

Continued representation on FQPA's Implementation Committee TRAC (Tolerance Reassessment Advisory Committee) will also be maintained in order to work with other commodity groups and registrants to provide technical input to U.S. EPA and the USDA as well as to export market regulations.

Recent changes in the international regulation of methyl bromide has resulted in our planning to join the Crop Protection Coalition. This is the coalition that works exclusively on Methyl Bromide issues at federal and international levels. Although our major use of this chemical has been in an area previously exempted from phase-out, EU and environmental organizations are moving to limit our quarantine uses. This year's international meeting of the parties to the Montreal Protocol in November will review critical requirements that could restrict citrus uses.

. **Federal Advisory Committee:** The USDA and U.S. EPA have again named CCQC's President to be a member of the Committee to Advise on Reassessment and Transition (CARAT). This committee consists of a diverse group of stakeholders from across the U.S. to provide input to the Agency and Department on implementation of the Food Quality Protection Act. Access to key policy makers and division directors at EPA is but one of the important benefits for CCQC.

. **Emergency and Special Local Needs (SLN) Registrations:** The availability of Section 18 registrations is important for the control of new pests and established pests or diseases where control has been lost due to resistance or withdrawal from the marketplace of labeled pesticides. Generation of these requests directed initially to the state may require the use of contracted experts. Special uses of existing pesticides are frequently covered under 24(c) Special Local Needs (SLN) registrations. Coordination between registrants and state officials are critical to these registrations. In 2004, CCQC initiated two Section 18 requests for fungicides for use on mandarin fruit.

. **Disease Control:** Critical new active ingredients are very difficult to register due to limited market potential for the registrant and the high probability of pesticide residues in the crop at the time of consumption. Support of residue studies through governmental programs such as IR-4 and funding by commodity-based organizations is often necessary to assure registration for critical needs. Since only a limited number of active ingredients are currently available, registrants need to be made aware of the critical role these tools play in our ability to store and export citrus. Support for new fungicide registrations can be aided by CCQC's contacts with EPA officials stressing our priority candidates for registration.

. **Food Quality Protection Act:** Contact with EPA officials in Washington D.C. and in California will become increasingly important as individual chemicals important to California citrus continue to be reviewed under FQPA over the next two years. In order to convey accurate information on the practices of the citrus industry to key EPA officials, a California citrus crop tour was held early in 2003 and may be repeated in 2005. In order to convey the diversity of geographic and cultural practices to regulators, CCQC feels a tour focusing solely on citrus is very beneficial.

. **California Regulations:** Proposition 65 has raised issues for the citrus industry in California. CCQC has worked with registrants, other commodity groups and the Office of Environmental Health Hazard Assessment (OEHHA) to prevent the listing of pesticides reviewed in the past. The provisions of the Birth Defects Prevention Act may be reviewed by state regulators to see if Thiabendazole and Imazalil should be listed under this Act.

INTERNATIONAL ISSUES

. **Codex:** The international standards for pesticide tolerances under the terms of the World Trade Agreement (WTO) are set by the Codex Committee on Pesticide Residues (CCPR) and approved by the Codex Commission. CCQC is a member of the U.S. delegation to the CCPR and initiated a process to expedite the establishment of tolerances for new pesticides in coordination with the Northwest Horticultural Council. Since current procedures can take up to eight years for tolerances on a new pesticide after its registration in the U.S., the availability in the U.S. of new pesticides is not the only requirement to be met before new tools can be used on California citrus.

Based on input by CCQC and other commodities representatives working with the U.S. delegation to the CCPR, at this year's Codex Commission meeting an expedited tolerance setting process for pesticides gained support. (A pilot program, referred to as the Interim MRL Process, was launched at the CCPR meeting in April 2004.) The recent decisions by the Japanese and Taiwan governments to set up new regulatory systems that include partial deferral to Codex tolerances are two examples of the importance of Codex standards being set as soon as possible after registration is completed in the U.S.

Based on the application submitted by CCQC, the Codex Alimentarius has granted the International Society of Citriculture (ISC) observer status as an International Non-Governmental Organization in the Work of the Codex Alimentarius Commission and its subsidiary bodies including the committees. Attendance at two committees, the Codex Committee on Pesticide Residues (CCPR) and the Committee on Food Additives and Contaminants (CCFAC), under the ISC flag, continues to allow us to provide critical input on California citrus issues.

. **Barriers in Export Markets:** As importing countries raise issues about citrus sent from California, CCQC must be ready to meet with visiting importing country foreign officials and secure the necessary resources to bring these officials and scientists into California for face-to-face visits with the industry and regulators when necessary. Maintenance of existing markets requires rigorous attention to

new issues that already affect trade. Research to evaluate pest risk claims in export market countries was added to this project.

- **Pesticide Use and Residue Issues In Export Markets:** Based on the experiences of the last few years, a few key export markets are requiring information on pesticide use and crop residues in order to answer consumer and retail chain concerns. A very targeted program will be carried out to determine whether we have residues that exceed the standards in key export markets.

The choice of chemicals to be tested will be based on market dynamics in key markets and the differences between the U.S. and importing country's standards. This database will be augmented by data that can be obtained from governmental and industry sources. In addition, a pest management schedule will be updated for major California citrus crops by production region. This information will be provided to marketers to share with retail customers and regulators in export countries.

- **Export Manual:** The need by the citrus industry for web-based user-friendly information, including the requirements set by key importing countries is a priority. The new database generated by the USDA's Foreign Agriculture Service (<http://mrl database.com>) for pesticide standards in up to 50 export markets will be used as a key component in the manual. Data on food additives and the technical requirements for citrus will also be sought. This manual will be placed on an appropriate web site. Updates to this web site must be provided in a timely manner to assure that shippers have the correct information.

- **Pest Prevention:** The expansion of imported citrus raises new issues of introduced pests and their management. Many federal, state and foreign agencies play key roles in assuring the protection of California production. Organizations such as the North American Plant Protection Organization (NAPPO) are key for the coordination of these activities between Mexico, Canada and the U.S. CCQC will continue to participate in NAPPO meetings and work toward improving the process for California citrus and other commodities.

- **North American Free Trade Agreement (NAFTA):** Under terms of this agreement, a technical work group is working on harmonizing the pesticide registration processes for Mexico, Canada and the U.S. Meetings are held one to two times per year in one of the three countries to discuss registration issues including joint registration. Registrant and commodity input has been sought and CCQC serves on one of the subcommittees. Policy issues in the past have been modified and improved based on commodity input. The potential for adverse effects to U.S. crops arises in cases where all three countries take the most conservative approach toward risks of each independent national assessment.

- **Federal Agriculture Trade Advisory Committee:** The President of CCQC has again been named to the Agricultural Trade Advisory Committee (ATAC) of the U.S. Department of Agriculture. The Committee is playing a pivotal role in defining the position of U.S. trade negotiations for the current round of multilateral trade negotiations under WTO. Agriculture has been elevated to the major area of negotiations this year.

OTHER ISSUES

- **Food Safety and Security:** Recent issues on the safety of raw fruit juices and produce items have led to an exponential increase in retail chain interest in microbial food safety. The lead agency on most produce items, the Food and Drug Administration, has received input from commodity organizations and on trade association, the United Fresh Fruit and Vegetable Association. CCQC

participated on a council of the United Fresh Fruit and Vegetable Association that addresses food safety and other key policy issues.

European retail chains have been on the cutting edge of the most restrictive requirements for Good Agricultural Practices (GAP's) and Good Manufacturing Practices (GMP's) and appear steadfast in their efforts to move these requirements to their U.S. suppliers. Surveillance of their requirements may need to be increased in order to generally prepare California citrus for the EU and other markets influenced by their retail standards.

. **Food Additives at Risk:** Recent changes to Food Law and Regulations in nations such as Japan and at the international level under Codex regarding food additives has prompted increased attention by CCQC. Formal coalitions to address these issues are lacking at this time. One initial success was promoting the regulatory status of carnauba wax in Codex. We addressed this issue in cooperation with service companies and pome fruit representatives.

. **Consulting Services:** As partial compensation for the countless hours expended by the Chairman of the Board of CCQC chairing meetings, reviewing all minutes and providing valuable institutional knowledge to CCQC management, a consulting fee is paid. The Chairman, Dr. Charles Coggins, has also taken on additional projects in the area of EPA chemical reviews and Codex and SLN registrations.

2,4-D Isopropyl Ester (2,4-D-IPE) Formulations **for Use as a Plant Growth Regulator on Citrus**

In the early 1990s, the registrants of the two formulations were informed that cancellation of the 2,4-D products would take place in the very near future unless studies specified by the US-EPA were performed, following which re-registration would be approved or denied. The registrants informed our citrus industry that they were not prepared to go through the expense of re-registration.

At the request of the California citrus industry, CCQC agreed to coordinate such studies if the California citrus industry would provide necessary funds. In turn, the registrants agreed to continue to keep these two formulations in the market place until US-EPA made its re-registration decision. In addition, US-EPA agreed to permit the sale of these formulations during the re-registration process. Also, the registrants agreed to pay a license fee to CCQC based on the amount of product sold. The effective dates of the agreements between CCQC and the registrants were in January 1993 and December 2000.

A total of 26 studies were required. The cost to carry out the studies and support acceptance of the studies by the US-EPA and Codex exceeded \$2 million. **We are very pleased to announce that all 2,4-D active ingredients have been re-registered effective August 8, 2005.**

Also, we wish to inform you that the project has received some financial support from Arizona, Texas and Florida citrus interests and from the South African citrus industry. The South African citrus industry is supporting the tolerance for 2,4-D in the European Union (EU) that will also allow California citrus entering EU countries to carry a 2,4-D residue. The major source of funds returned to CCQC, and thus to the California citrus industry, is due to the license fees as per the above paragraph. All together, slightly less than \$800,000 has come to CCQC from all of these sources. Registrants have agreed to continue with license fee payments until all re-registration expenses have been met.

We congratulate the California citrus industry for successfully protecting this important tool.

- Wally Ewart and the CCQC Board

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