



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

PROTOCOL ON PRIVATE SAMPLING AND TESTING AND THE RECOGNITION THEREOF – CONSIGNMENT DESTINED FOR EXPORT: MAXIMUM RESIDUE LIMIT

THE PURPOSE

The purpose of the protocol is to reduce the number of samples that are drawn for official regulatory analytical tests on consignments destined for export. The protocol seeks further to recognise efforts that are undertaken privately by Food Business Operators (FBO) in mitigating risk associated with the use of agrochemicals, heavy metals and microbial contamination, and the attainment of acceptable maximum residue limits.

REFERENCE TO REGULATORY REQUIREMENTS

The protocol should be read in conjunction with the following:

- Agricultural Product Standards Act, 1990 (Act 119 of 1990);
- Standards Regarding Food Hygiene and Food Safety of Regulated Agricultural Food Products of plant origin intended for export, R707 of 13 May 2005;
- Regulation Regarding the Control of Export of Fruits, R748 of 3 October 2014;
- Standard Operating Procedure on Sampling and Analysis of Agricultural Products of Plant origin to determine Agro-chemical residue levels and risk management as part of export inspection and certification in terms of the Agricultural Product Standards Act (latest revision);
- Standard Operating Procedures on the Nomination, Official Recognition and Appointment of Accredited, Private and Parastatal South African laboratories to assist in managing the Food Safety Risk of regulated Agricultural products destined for export; and
- Relevant Export Standards and Requirements as promulgated.

REDUCED FREQUENCY OF OFFICIAL SAMPLING AND TESTING

The frequency of official sampling is determined in accordance with the Standard Operating Procedure on Sampling and Analysis of Agricultural Products of Plant origin to determine Agro-chemical residue levels, microbial contamination and heavy metals and risk management as part of export inspection and certification in terms of the Agricultural Product Standards Act, however, under the approved protocols as outlined hereunder, Food Business Operators may be exempted. In other words, the frequency of official sampling and testing shall be carried out once per Food Business Operator per product in a season. The following serves as the protocol upon which approval or disapproval can be granted:

(1) Suitability of the Food Business Operators in particular Production Units and Packhouses - The FBO shall be certified in accordance with the Standards Regarding Food Hygiene and Food Safety of Regulated Agricultural Food Products of plant origin intended for export, or officially recognised equivalent commercial certification in either Good Agricultural Practice or Good Manufacturing Practices or Good Hygiene Practices, whatever the case may be.

(2) Use of plant protection products by the Food Business Operator:

- (a) A full list of plant protection products used/applied shall be kept throughout the handling activities (supply chain) of the FBO.
- (b) Records of spray programmes including the purpose for which those agro-chemicals were applied shall be kept by the FBO.
- (c) Only South African officially registered plant protection products that are registered in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947).
- (d) Packhouses shall keep a registered list of production units officially certified according to Regulation Notice 707, and furthermore, spray programmes including the certificate of analysis shall be kept.
- (e) At delivery point, the FBO (PHC) shall draw samples and test for purposes of monitoring and compliance with respect to agro-chemical residues.
- (f) The FBO shall draw samples and test for microbial and heavy metals for purposes of monitoring compliance: Provided that such products may only be tested in compliance with the importing country's requirements e.g. Indonesia.

(3) Sanitation Protocols and schedule:

- (a) Cross contamination and microbial growth that may affect the safety of the product shall be prevented by taking, amongst other measures, steps to avoid the accumulation of agro-chemical residue on equipment.
- (b) The FBO, as the case may be, shall have a sanitation protocol and schedule for equipment and processing areas.
- (c) Only potable water shall be used for cleaning and sanitizing.

(4) Private Samplers drawing samples for monitoring:

- (a) Only trained samplers shall draw samples. The samplers shall be trained by the PPECB at a cost borne by the FBO, or verified against the criteria as laid out by the PPECB.
- (b) Knowledge of sampling techniques and of sample handling for transportation to a laboratory are essential to guarantee the integrity of samples taken for verification.

(5) Communication by the FBO:

- (a) The test results shall be shared with the PPECB and the Department of Agriculture, Forestry and Fisheries (DAFF) so that a proper risk profile may be built.
- (b) The results of the analysis shall be communicated within 48 hours upon receiving them from an officially recognised laboratory.
- (c) Any change relating to any risk associated with either the product, sampler or amended list of agro-chemicals used shall be communicated to the PPECB.

(6) Approval or exemption of an FBO by the PPECB:

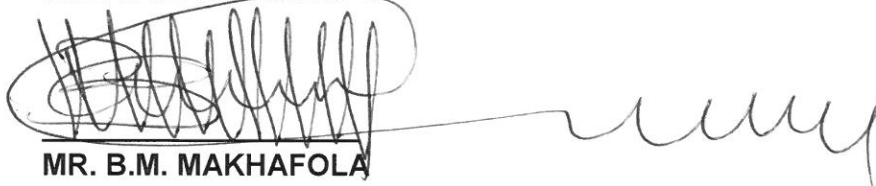
- (a) The PPECB shall once a year or upon application by the FBO audit for compliance purpose the FBO against this protocol.
- (b) The approval or non-approval thereof, shall be communicated to the FBO after 24 hours of completion of the auditing.

(c) Once approved, the FBO will then be entered into a list of exempted FBO for purposes of reduced frequency of sampling.

(7) Revocation:

- (a) Should, there be any non-compliance emanating from the protocol itself or any exceedence of the set maximum residue limit, or the use of a banned or non-registered agro-chemical, the PPECB shall, with immediate effect, suspend such FBO from the registered list: Provided that the necessary consideration and evaluation shall have been taken into account.
- (b) Pursuant to the importing country's requirement, the Executive Officer may revoke the application of the protocol either partially or wholly.
- (c) The PPECB based on its own objective assessment may remove the FBO from the registered list if it is convinced that the registered FBO is not disclosing all the relevant information incidental to the application of the Protocol.

It is hoped, that at all material times, only officially recognised laboratories shall be used in order for the exemption to be considered favourably. All private commercial standards to which FBOs are certified shall be current and up to date in order for them to be considered.



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