

# California Citrus Quality Council (CCQC)

## Quality Assurance Program

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### MISSION & OBJECTIVE STATEMENT

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 re-registration 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).

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. The Chilean citrus industry has expressed interest in using portions of the data.

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 post-harvest 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.

- **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. EPA has initiated their review of sodium cyanide uses. CCQC has been working with the owners of the label, EPA and Dr. Krieger who has done the worker and environmental exposure studies on sodium cyanide to assure a favorable outcome of the review.

## 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) is being 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 FQPA. Through representation on the Minor Crops Farmer Alliance (MCFA) Executive Committee, member of the International Subcommittee of MCFA and Secretary of MCFA, CCQC continues to provide California citrus industry's valuable input into EPA during the implementation of the FQPA and registration review.

Recent changes in the international regulation of methyl bromide have resulted in our joining the Crop Protection Coalition. This 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.

- **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.

CCQC worked closely with Bayer Crop Science, California's Department of Pesticide Regulation and the California Department of Food and Agriculture to expedite approval of critical pesticides needed to control or eradicate Asian citrus Psyllid.

- **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.

- **Registration Review, Ecological Risk and Endangered Species 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 the Food Quality Protection Act (FQPA). Now that EPA has completed its tolerance review process it will begin a process to "reregister" chemicals on a ten year review schedule. This process will also include ecological reviews to ensure that individual chemicals meet the provisions of the Endangered Species Act (ESA).

In order to convey accurate information on the practices of the citrus industry to key EPA officials, a California citrus crop tour will be organized. 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. CCQC will monitor this issue and partner with other citrus industry organizations to address regulatory issues regarding pesticide VOCs and other important crop protection tools.

## 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.

An expedited tolerance setting process for pesticides gained support, based on input by CCQC and other commodities representatives working with the U.S. delegation. A pilot program, referred to as the Interim MRL Process, was launched at the CCPR meeting in April 2004. In 2005 the Codex Commission approved the first three chemicals to be placed in the accelerated Interim process. The recent decisions by the Japanese, European Union, and Taiwan governments to set up new regulatory systems that include partial deferral to Codex tolerances are three 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 when necessary.

- **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.

In 2005, the use of CCQC funds was critical in setting up and implementing the Korean Work Plan and the Australia Preclearance Program. In the coming season CCQC will continue to serve as the focal point for the protection of access to these two markets.

- **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 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 data base will be augmented by data that can be obtained from governmental and industry sources.

- **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. A database generated by the USDA's Foreign Agriculture Service (HYPERLINK "<http://mrldatabase.com/>"<http://mrldatabase.com>) for pesticide standards in up to 50 export markets will be maintained as a key component in the manual. Data on food additives and the technical requirements for citrus are also included. This manual is included on CCQC's Web site and will be maintained to include updated information and modified based on industry feedback.

- **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 important 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.

The introduction of Asian citrus psyllid (ACP) into California will require significant regulatory response to minimize the spread of ACP and the introduction of Huanglongbing (HLB). CCQC plans to lead industry efforts to coordinate ACP and HLB response activities with the Mexican citrus industry to try to ensure protection of both industries.

- **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**

CCQC is a member of 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 associations, the United Fresh Produce Association.

CCQC participates on a council of the United Fresh Produce 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 followed by the clearance of allowances for wood glycerol esters. CCQC will continue to monitor these issues.

- **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 has also taken on additional projects in the area of EPA chemical reviews and Codex and SLN registrations.

**NOTICE:** The research results included in this publication are summary reports for the benefit of the Citrus Research Board and the growers it serves. They are not to be taken as recommendations from either the individual reporting or the agency doing the research. *Some of the materials and methods mentioned are neither cleared nor registered for commercial use.* The summaries were written by the project leaders identified. Both technical names and registered trademarks of materials are used at the discretion of the authors and do not constitute any endorsement or approval of the materials discussed. Questions on possible applications should be directed to the local University of California Extension Specialist, a licensed PCA, or the appropriate regulatory agency.