



28 July 2020

INDUSTRY ADVICE NOTICE NO: 2020-47

Horticulture Exports Program – Changes to Thailand Food and Drug Administration Guideline for implementing surveillance measures for imported fruit and vegetables to be implemented 1 August 2020

Purpose

This Industry Advice Notice (IAN) is to advise that Thailand Food and Drug Administration (FDA) has revised some of the residue monitoring measures on imports of fresh fruit and vegetables scheduled to commence 1 August 2020.

Summary of changes and key points

- This notice updates information in IAN [2020-35](#).
- Thailand FDA have published a revised [Guideline for monitoring imported fruits and vegetables](#). An unofficial translation of the Guideline is provided in ANNEX 1 of this notice. The sections that reflect the revisions are highlighted.
- The revised measures include
 - testing for 'high risk' will be implemented on a random basis instead of 100%.
 - the Certificate of Analysis for 'high risk' is now a list of chemicals specific to each commodity. These are published on the [Thai FDA webpage](#) and listed in English in ANNEX 2 of this notice.
 - the Certificate of Analysis for 'very high risk' only needs to include the chemical(s) identified in the list published by the Thai FDA regardless of the date of the non-compliance.
- Thailand continues to update and publish the list on their [website](#) of exporters identified as 'very high risk' for a particular product. The department will not be able to notify each time the list is updated, so exporters are urged to monitor this frequently prior to and after implementation on 1 August 2020.

Background

- On 16 July 2020, the Thailand FDA issued revised pesticide chemical residue monitoring measures on fresh fruit and vegetables to be implemented on 1 August 2020.
- These revised measures supersede, the previous measures published by the Thai FDA.
- The department recommends exporters monitor the Thai FDA webpage regularly and contact your importer for more information.

Contact information

If you have any questions regarding this IAN please email [lenna.garwood](mailto:lenna.garwood@awe.gov.au).

David Ironside
Assistant Secretary
Plant Export Operations Branch

ANNEX 1:

---- UNOFFICIAL TRANSLATION ----

Guideline for monitoring imported fruits and vegetables that may contain chemical residues to be implemented by FDA stations at the ports of entry (for importers)

published 16 July 2016

(Note the **yellow highlighted** text identified the key differences from the previously published Guideline)

Rationale

On 27 December 2019, the Ministry of Public Health announced that the year 2020 shall be the Year of Food Safety as a national agenda. Then, on 24 January 2020, the Food and Drug Administration (FDA) issued the *Explanation Re: Monitoring of fruits and vegetables that may contain chemical residues, including production, importation and sales*.

Testing for chemical residues and checking the labelling for fruits and vegetables at the FDA port shall occur for every incoming shipment, unless the importer can present a certificate of analysis (CoA) issued by the authority in the source country or by an ISO/IEC 17025 accredited private laboratory. The Bureau of Export and Import, FDA, therefore, issued this guideline for monitoring imported fruits and vegetables that may contain chemical residues to be implemented by FDA ports (for importers).

Operational framework

1. This measure is in accordance with the Ministry of Public Health (MOPH) notifications 1) *Re: Food Containing Pesticide Residues (Pesticide Residues in Food)* and 2) *Re: The Requirements for Production Processes, Production Equipment, Storage and Labelling of Some Fresh Fruits or Vegetables, with the virtue of the National Food Act B.E 2522 (1979)* and MOPH notification *Re: Testing of Food Imported into the Thailand* dated 13 June 2016.
2. All fresh fruits and vegetables are required to comply with the FDA's Explanation. Dried and frozen fruits and vegetables are excluded.
3. The Import and Export Inspection Division, FDA, has published a list of fruits and vegetables on which chemical residues have been detected (Very high risk list). This informs officials and importers of the types of products and the exporters that may pose a risk for chemical residues. This list was compiled from products where chemical residues have been detected at a level exceeding the regulation. Exporters and source countries are from FDA's detention system.
4. The Division has classified fresh fruits and vegetables into 3 groups as follows.
 - 4.1 "Very high risk" means fresh fruits and vegetables that appear in the list of fresh fruits and vegetables that detected with chemical residues.
 - 4.2 "High risk" means fresh fruits and vegetables that have a record of non-compliance **higher than** 20 percent in the **fiscal** year 2018-2019 from FDA's testing record.

Top 5 items include

Vegetables: pea, celery, coriander, Chinese kale and Chinese spinach

Fruits: cherry, citrus, strawberry, table grapes and dragon fruit

- 4.3 “Low risk” means fresh fruits and vegetables that have a record of non-compliance **lower than** 20 percent in the fiscal year 2018-2019 from FDA’s testing record, and do not appear in the very high risk nor high risk lists.
5. The officials will implement the sampling and testing measure for imported fruits and vegetables as per the risk level, from very high to low, respectively.
6. The Import and Export Inspection Division, FDA will facilitate the import by waiving some measures, if the importers of fresh fruits and vegetables can provide the certificate of analysis (COA) as per the requirement. Eligible COA shall be issued by the government authority in source country or a laboratory endorsed by the government authority or a ISO/IEC 17025 accredited private laboratory, demonstrating that product safety complies with the regulation. It is noted that COA is not mandatory, but is a measure to help fasten the inspection process.
- The chemicals that are required in COA are as follows:
- 6.1 Very high risk group shall cover the chemicals that appear in the list of ‘Very high risk’
- 6.2 High risk group shall cover list of chemical residue applicable for each high risk product, plus glyphosate, paraquat and chlorpyrifos.
7. The ‘Very high risk’ list and list of chemical residue applicable for each high risk product can be checked from the Import and Export Inspection Division, website. (www.fda.moph.go.th/sites/Logistics/Pages/Main.aspx)

Process for importers

1. To check if the product and producer/exporter falls under ‘**very high risk**’ from the list of very high risk. If fall under this list, FDA inspectors at the FDA ports will take a sample and hand it over to importer for testing at the government laboratory or an ISO/ IEC 17025 laboratory for checking the chemical residue(s) that was detected.

The consignment will be managed as per the following procedure:

- 1.1 Considering the storage at the port and the need of importer, if FDA official think that the consignment **can wait** until the testing result is available, then consignment will be held at the port. The cost of storage will be borne by the importer.
- If the testing result complies with the regulation, the customs process can be proceeded.
 - If the testing result does not comply with the regulation, the consignment will be rejected.
- 1.2 Considering the storage at the port and the need of importer, if FDA official think that the consignment **cannot wait** until the testing result is available, the importer must express their request in writing to not wait for the testing result with justification with the condition that ‘The importer must agree for the consignment to be detained at the importer’s premise as per the import license until the consignment is released for further process’.

The Import and Export Inspection Division, FDA will facilitate the import if the importer can present COA which demonstrates that the chemical that appears in the very high risk is in compliance with the Thai regulation. This provision will allow smooth clearance process.

2. To check if product falls under **high risk group**. If fall under this group, FDA inspector will **randomly** take a sample for chemical residue testing at the laboratory and then, the import can proceed through the customs process.

Importers may present COA which cover chemicals applicable for each high risk product to demonstrate compliance. This will facilitate quick clearance process. The list of chemicals applicable for each high risk product can be checked from the division website.

3. If product is **not on very high risk nor high risk**, it shall be treated as low risk. The FDA inspector will randomly take a sample for testing by GT-Pesticide test kit and GPO TM/2 kit, then the import can proceed through the customs process.

If the preliminary test results suggest non-compliance, FDA will send the remaining sample for chemical residue testing.

4. If product falls under the MOPH notification *Re: The Requirements for Production Processes, Production Equipment, Storage and Labelling of Some Fresh Fruits or Vegetables*, the importer shall provide a packinghouse certificate issued by the competent authority or other organisation recognized by the competent authority, or a certifying body (CB) recognized by the accredited body that is a member and recognised by the International Accreditation Forum (IAF)
 - 4.1 An original; or
 - 4.2 A copy that must be verified by the issuing organisation or the embassy of source country in Thailand or a government organization in source country or the organisation endorsed by government of source country such as Notary public / Chamber of commerce / Commissioner of Oaths / Justice of Peace etc.
 - 4.3 Other documents such as a Health certificate, a Certificate of Free Sale, if there is a statement covering the sorting and packing process until fruits are packed into packaging, issued by the government organisation can be used for this purpose as well.
5. The label for fresh fruits and vegetables under 6 shall include the producer name, location, source country and product name to facilitate the official to check the certificate.

ANNEX 2:**---- UNOFFICIAL TRANSLATION -----****List of chemicals applicable for each 'high risk' product required in Certificate of Analysis****VEGETABLES:****Celery (18 chemicals)**

Carbaryl	Carbendazim	Carbofuran
Chlorfenapyr	Chlorpyrifos	Cypermethrin
Deltamethrin	Fenobucarb	Fipronil
Fosthiazate	Glyphosate	Lambda-Cyhalothrin
Metalaxyl	Methomyl	Paraquat
Picoxystrobin	Profenofos	Pyrimethanil
Carbaryl	Carbendazim	Carbofuran
Chlorfenapyr	Chlorpyrifos	Cypermethrin
Deltamethrin	Fenobucarb	Fipronil
Fosthiazate	Glyphosate	Lambda-Cyhalothrin
Metalaxyl	Methomyl	Paraquat
Picoxystrobin	Profenofos	Pyrimethanil

Chinese kale (12 chemicals)

Atrazine	Carbendazim	Chlorfenapyr
Chlorpyrifos	Cypermethrin	Fenpropathrin
Fipronil	Fosthiazate	Glyphosate
Isoprocarb	Paraquat	Thiophanate-Methyl
Atrazine	Carbendazim	Chlorfenapyr
Chlorpyrifos	Cypermethrin	Fenpropathrin
Fipronil	Fosthiazate	Glyphosate
Isoprocarb	Paraquat	Thiophanate-Methyl

Sweet pea (13 chemicals)

Carbendazim	Chlorfenapyr	Chlorothalonil
Chlorpyrifos	Cyfluthrin	Cypermethrin
Dimethoate	Glyphosate	Omethoate

Paraquat	Permethrin	Pyrimethanil
Thiophanate-Methyl		

Chinese spinach (10 chemicals)

Carbendazim	Chlorfenapyr	Chlorothalonil
Chlorpyrifos	Cypermethrin	Glyphosate
Lambda-Cyhalothrin	Omethoate	Paraquat
Pyrimethanil		

Coriander (13 chemicals)

Bifenthrin	Chlorfenapyr	Chlorpyrifos
Cypermethrin	Glyphosate	Isoprocarb
Lambda-Cyhalothrin	Metalaxyl	Paraquat
Phorate	Profenofos	Pyrimethanil
Triadimefon		

FRUIT:

Dragon fruit (5 chemicals)

Carbendazim	Chlorpyrifos	Glyphosate
Metalaxyl	Paraquat	

Cherry (4 chemicals)

Chlorpyrifos	Fenpropathrin	Glyphosate
Paraquat		

Strawberry (6 chemicals)

Chlorpyrifos	Glyphosate	Methomyl
Paraquat	Propargite	Pyrimethanil

Citrus (14 chemicals)

Bifenthrin	Carbendazim	Carbofuran
Chlorfenapyr	Chlorpyrifos	Cypermethrin

Dicofol	Ethion	Glyphosate
Omethoate	Paraquat	Profenofos
Thiabendazole	Triazophos	

Table grapes (8 chemicals)

Chlorfenapyr	Chlorpyrifos	Cyfluthrin
Fenobucarb	Fenpropathrin	Glyphosate
Paraquat	Prothiofos	