

Voluntary Report – Voluntary - Public Distribution

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Report Name: Thailand Issues Its Revised Pesticide Residues Monitoring Procedures on Fresh Produce

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Report Highlights:

On July 15, the Thai FDA issues its revised pesticide residues monitoring measures on fresh produce that will be implemented on August 1, 2020. The revised monitoring measures will supersede any previous measures they officially published on the Thai FDA web site.

Thailand Revised Its Pesticide Residues Monitoring Procedures on Fresh Produce

The Office of Agricultural Affairs at the U.S. Embassy met with the Thai FDA on July 8 to discuss about the concerns over the new monitoring measures on fresh produce inspection at the port of entry. On July 15, the Thai Food and Drug Administration (FDA) issued the revised guidelines to test imported fresh produce for pesticide residues according to the Notification of the Ministry of Public Health No. 387 Re: Food Containing Pesticide Residues in Food. The revised measures supersede all previous measures officially published on the Thai FDA web site. The enforcement date remains August 1, 2020.

Below are key areas amended from previous announcements:

- The testing measure for “High Risk” category will be implemented on a random basis instead of on “every shipment” basis;
- The revised pesticides list required to be tested and on Certificate of Analysis for “High Risk” category - no more 134 pesticides required;
- The revised on the pesticides list required to be tested and on Certificate of Analysis for “Very High Risk” category - no more 134 pesticides required.

Clarification on the Guidelines

The guidelines were issued to inform importers and exporters of fresh produce on how the Thai FDA’s Import and Export inspection Division will enforce their pesticide residues monitoring program and testing protocol in relation to the Ministry of Public Health Notification No. 387 Re: Pesticide Residues in Foods. (additional reference: Section III Pesticides and Other Contaminants of [Thailand: FAIRS Country Report](#)) The Thai Food and Drug Administration (FDA) has had a testing protocol in place for a while but considered it an internal practice. In the past, if any shipment tested positive, the exporter’s names will be in the Thai FDA’s quarantined list and the Thai FDA notified the importer for legal action (the importer notified the exporter and paid a fine for the violation) and the following three shipments of the same product by the importer from the same exporter would be held and tested for pesticide residue.

The Thai FDA classifies imported produce based on their risk levels into three classifications and from August 1, 2020 onwards, the following key measures will be implemented by the Thai FDA at the port of entry.

Group1: Very High Risk Group

The fresh produce and exporters that fall under the “Very High Risk Group” are listed in the table: *List of Imported Vegetables and Fruits that Failed to Meet the Quality Standards Testing Fiscal Year 2020* on the Thai FDA’s Import and Export Inspection’s web site at <http://www.fda.moph.go.th/sites/Logistics/Pages/Main.aspx>. The types of fresh produce and exporters’ names listed are those found to be noncompliant with the Notification of the Ministry of Public Health No. 387 Re: Food Containing Pesticide Residues in Food as per the Thai FDA’s past quarantine records.

As of July 16, 2020, there are three U.S. exporters of fresh cherries, grapes, and horseradish on the list. The pesticide residues found non-compliant are fenpropathrin for cherries and grapes; and methiocarb for horseradish.

Monitoring measures at the port of entry for Category 1: Very High Risk

1. The shipment will be held and tested for only the problematic pesticide indicated in the “Very High Risk” table. The Thai FDA will collect the samples given to the importers for testing at a government lab, a government assigned lab, or a private laboratory complying with ISO/IEC 17025. The importers will be responsible for the lab testing expense.
2. The shipment will be detained while waiting for the test results. However, the Thai FDA will consider whether the shipment must be kept at the port or can be moved to the importers’ warehouse with the importer’s signed letter of intent. If the result is

negative, the shipment will be released. Otherwise, the shipment will not be allowed to enter the country.

3. If the importer does not want the shipment to be tested in Thailand, a Certificate of Analysis (COA) issued by a government laboratory of the exporting country, a government assigned lab, or a private laboratory complying with ISO/IEC 17025 can be used. A COA is required for only the problematic pesticides listed in the “Very High Risk” table for any noncompliant exporter with the specific products listed in the table published on the Thai FDA’s web site.

Special Note: The exporters whose names are listed on the table would be delisted by having three consecutive shipments tested in the country and found to be compliant with the regulation.

Group 2: High Risk Group

The Thai FDA’s Import-Export Inspection Division has conducted a pesticide-testing program on fresh produce for fiscal year 2019-2020 and below is the list of fresh produce that often contained pesticide residues 20 percent above the standard.

Fresh fruits: cherries, oranges, strawberry, grapes, and dragon fruits

Fresh vegetables: sweet peas, celery, coriander, Chinese kale, and spinach

The above 10 product types are classified as “High Risk.” In order to import products listed under this category, a Thai FDA officer at the port of entry will increase the frequency of random sampling of the incoming shipments to be tested at a government laboratory. The Thai FDA will be responsible for the lab testing expense.

The shipment will not be detained and can be commercially marketed. If the importer does not want the shipment to be tested in Thailand, the importer can present a Certificate

of Analysis (COA) issued by a government laboratory of the exporting country, a government assigned lab, or a private laboratory complying with ISO/IEC 17025 for that shipment. The required pesticides for each specific produce type are listed in the Annex 1 table. If the test result is found to be noncompliant with the regulation, then the Thai FDA will place the exporter's name and the type of product on the "Very High Risk" list. It only takes one instance of being found noncompliant for the exporter's name and the type of product to be added to the "Very High Risk" list.

Group 3: Low Risk Group

Products that are not classified as "Very High Risk" or "High Risk" are classified as "Low Risk." The Thai FDA's Import-Export Inspection Division will conduct random testing using GT-Pesticide test kits & GPO-TM/2 kits as basic screening tests. If a test result is positive, the sample will be sent to a government laboratory for further comprehensive testing. If the test result is found to be noncompliant with the regulation, then the Thai FDA will place the exporter's name and the type of product on the "Very High Risk" list similar to the process in the "High Risk" group.

How to Continue Exporting if Found on the "Very High Risk" List

Exporters whose names are listed on the "Very High Risk" list can keep exporting fresh produce to Thailand after the implementation date of August 1, 2020, by supplying a certificate of analysis (COA) of the pesticide residues in question to the Thai FDA for each shipment. This method will keep a shipment from being detained but will not delist the exporter's name. If a shipment does not have a COA and the Thai FDA has not been notified about delisting (see next section), the Thai FDA will collect the samples for testing at a government lab. The purpose of this testing is only to release the shipment and not for delisting purposes.

How to be Delisted from the “Very High Risk” List

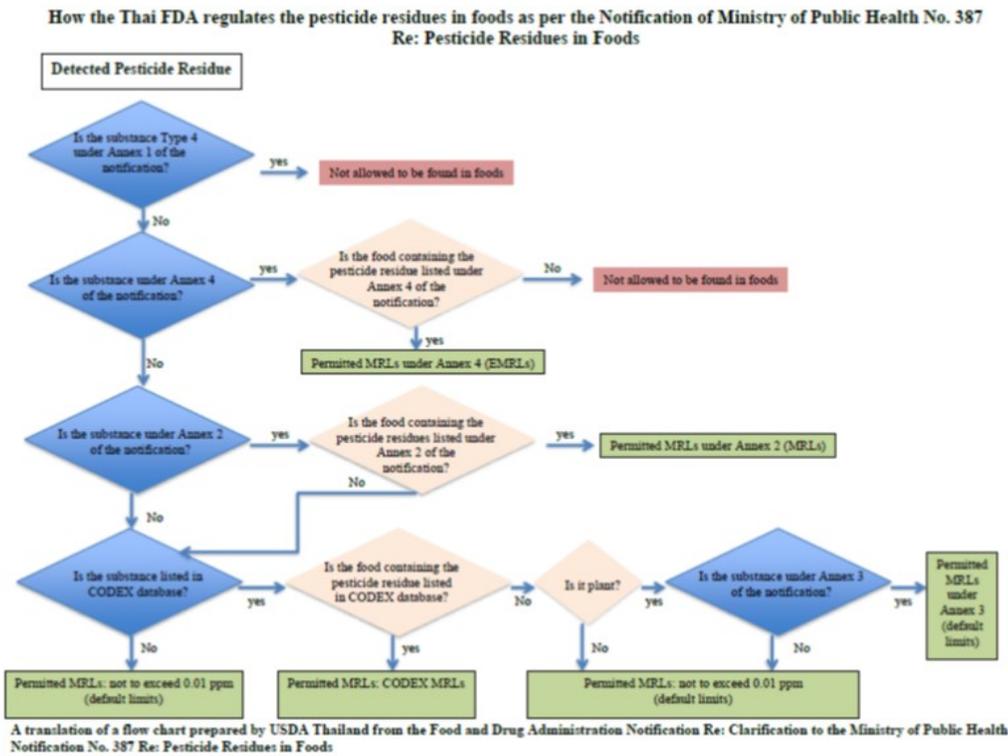
Exporters whose names are listed on the table under “Very High Risk” can be delisted by having three consecutive shipments of the listed product tested in country and found to be compliant with the regulation. The exporter or the importer must notify the Thai FDA that they wish to be delisted prior to having their shipments tested. If the Thai FDA is not notified, then any shipment of a listed product from an exporter on the “Very High Risk” list that is cleared after testing by the Thai FDA will not be counted towards the three consecutive shipments for delisting. After being notified, the Thai FDA will collect the samples for testing at a government lab, a government assigned lab, or a private laboratory complying with ISO/IEC 17025. The exporters or importers will be responsible for the lab testing expense.

Annex 1: List of Pesticides Required on Certificate of Analysis for Fresh Produces under “High Risk” Category

| VEGETABLES | | |
|-------------------------------------|--------------------|--------------------|
| Celery (18 substances) | | |
| Carbaryl | Deltamethrin | Metalaxyl |
| Carbendazim | Fenobucarb | Methomyl |
| Carbofuran | Fipronil | Paraquat |
| Chlorfenapyr | Fosthiazate | Picoxystrobin |
| Chlorpyrifos | Glyphosate | Profenofos |
| Cypermethrin | Lambda-Cyhalothrin | Pyrimethanil |
| Chinese Kale (12 substances) | | |
| Atrazine | Cypermethrin | Glyphosate |
| Carbendazim | Fenpropathrin | Isoprocarb |
| Chlorfenapyr | Fipronil | Paraquat |
| Chlorpyrifos | Fosthiazate | Thiophanate-Methyl |
| Sweet Peas (13 substances) | | |
| Carbendazim | Cypermethrin | Permethrin |
| Chlorfenapyr | Dimethoate | Pyrimethanil |
| Chlorothalonil | Glyphosate | Thiophanate-Methyl |
| Chlorpyrifos | Omethoate | |
| Cyfluthrin | Paraquat | |

| Spinach (10 substances) | | |
|--|--|---|
| Carbendazim Chlorfenapyr Chlorothalonil Chlorpyrifos | Cypermethrin Glyphosate Lambda-Cyhalothrin Omethoate | Paraquat Pyrimethanil |
| Coriander (13 substances) | | |
| Bifenthrin Chlorfenapyr Chlorpyrifos Cypermethrin Glyphosate | Isoprocarb Lambda-Cyhalothrin Metalaxyl Paraquat Phorate | Profenofos Pyrimethanil Triadimefon |
| FRUITS | | |
| Dragon Fruits (5 substances) | | |
| Carbendazim Chlorpyrifos | Glyphosate Metalaxyl | Paraquat |
| Cherries (5 substances) | | |
| Chlorpyrifos Fenpropathrin | Glyphosate Paraquat | |
| Strawberries (6 substances) | | |
| Chlorpyrifos Glyphosate | Methomyl Paraquat | Propargite Pyrimethanil |
| Oranges (14 substances) | | |
| Bifenthrin Carbendazim Carbofuran Chlorfenapyr Chlorpyrifos | Cypermethrin Dicofol Ethion Glyphosate Omethoate | Paraquat Profenofos Thiabendazole Triazophos |
| Grapes (8 substances) | | |
| Chlorfenapyr Chlorpyrifos Cyfluthrin | Fenobucarb Fenpropathrin Glyphosate | Paraquat Prothiofos |

Annex 2: A flowchart on how the Thai FDA regulates the pesticide residues in foods per the Notification of Ministry of Public Health No. 387 Re: Pesticide Residues in Foods



End of the Report.

Attachments:

No Attachments.