



Investigation Number

10923

Investigation Title

Silverbeet - FRSP - Detection of Pesticide (Methamidophos) - 9(2)(b)(ii)

Complaint Recorded By

9(2)(a)

Complaint Date

5-Sep-22

Investigator Assigned

Kimberly Holdaway

Subjects

Subject No: 39938

Subject Name: 9(2)(b)(ii)

Address: 9(2)(b)(ii)

Contact Name:

Contact Phone:



Investigation Summary

Report Date:

18-Oct-22

Released under the Official Information Act 1982



Informant / Complainant Details

Name: 9(2)(a)
Primary Contact: 9(2)(a)
Alternative Contact: 9(2)(a)
Address: 9(2)(a)
Assurance | New Zealand Food Safety- Haumaru Kai Aotearoa
Ministry for Primary Industries | PO Box 2526 | Wellington | New Zealand
9(2)(a) | Web:
www.mpi.govt.nz

Incident Details

Date: 5-Sep-22

Time: 9:30

Location:

Details:

On the 5th of September 2022 NZFS Food Compliance Services received information from 9(2)(a) regarding the detection of methamidophos in Silver beet grown by 9(2)(b)(ii)

- The detection of the prohibited insecticide was found in a FRSP testing of the vegetables.
- A risk assessment to human health of the insecticide were also attached.



Investigation Classification

Complaint Type Category: Chemical
Complaint Type Classification: Non-complying chemical
Illness Type:
Illness:
Commodity Category: Fruit & Vegetables
Commodity Classification: Fruit & Vegetables
Act/Regulations: Food Act 2014
Allegation: s244 - Involving breaching or failure to comply with requirement
Regime:
Food Sector Category:
Food Sector Classification:

Statutory Sanctions

Act: Food Act 2014
Sanction: s240 - Involving breaching or failing to carry out duty

Investigation Job Sheet

Total Time Taken: (includes 1 hour admin time) **15:15**

Investigator: 9(2)(a)

Date: 5-Sep-22

Time: 9:30

Category: Email

Identifier:

Comments:

Time Taken: 1:00

Appendix Register #1

From: Food Compliance <Food.Compliance@mpi.govt.nz>
Sent: Monday, 5 September 2022 10:23 AM
To: Jenny Bishop <Jenny.Bishop@mpi.govt.nz>; Steve Collinson
<Steve.Collinson@mpi.govt.nz>
Subject: RE: FRSP non-compliant result

Hi both,

I have identified that the grower, 9(2)(b)(ii) is registered with MPI 9(2)(b)(ii).



Steve, I will create a file for you shortly.

Kind Regards

9(2)(a)

Food Compliance & Response | New Zealand Food Safety - Haumaru Kai Aotearoa
Ministry for Primary Industries - Manatū Ahu Matua | Pastoral House, 25 The Terrace | PO Box
2526 | Wellington 6140 | New Zealand
Web: www.foodsafety.govt.nz Out of scope

From: Jenny Bishop <Jenny.Bishop@mpi.govt.nz>
Sent: Monday, 5 September 2022 9:36 AM
To: Food Compliance <Food.Compliance@mpi.govt.nz>; Steve Collinson
<Steve.Collinson@mpi.govt.nz>
Subject: FW: FRSP non-compliant result
Importance: High

Please determine who is the RA.

If it is us, please refer to Steve. If not, please let me know.

Ngā mihi

Jenny

From: 9(2)(a)
Sent: Monday, 5 September 2022 9:33 AM
To: Jenny Bishop <Jenny.Bishop@mpi.govt.nz>; 9(2)(a)
Cc: Karen Booth <Karen.Booth@mpi.govt.nz>; 9(2)(a)
Subject: FRSP non-compliant result
Importance: High

Hi Jenny 9(2)(a)

We have just had confirmation that a silverbeet sample tested under FRSP potentially is a food safety issue. Details of the sample is attached, including the draft risk assessment (which has yet to be peer reviewed). Noting that there are potentially 2 issues here, the food safety risk and the use of methamidophos on silverbeet, which is prohibited.

I will set up a meeting today to discuss next steps

9(2)(a)

9(2)(a)
Assurance | New Zealand Food Safety- Haumaru Kai Aotearoa
Ministry for Primary Industries | PO Box 2526 | Wellington | New Zealand
9(2)(a) | Web: www.mpi.govt.nz

Please find attached
- silverbeet FRSP methamidophos detection



Investigator: Kimberly Holdaway
Date: 5-Sep-22
Category: Phone Call, Meeting, Email
Comments:
Time: 9:45
Identifier:
Time Taken: 4:00

Investigation plan
Meeting with ACVM
Call with ACVM and Owner/Operator

11:45 Meeting with HOLDAWAY, COLLINSON and ACVM 9(2)(a)

-No known history on business
-This chemical should not be used on this crop
-Unknown how it would be sprayed
9(2)(a) team would have lab test report
-Possible site visit tomorrow
-Call to business at 14:00 with HOLDAWAY, 9(2)(a) and 9(2)(a)
-RHRA to be sent if recall needed

14:00 Phone call with HOLDAWAY, 9(2)(a) and 9(2)(a)

-Discussed what was needed from the call with business and who would talk about each point

14:07 Phone call with HOLDAWAY, 9(2)(a) 9(2)(a) and 9(2)(a) business owner/operator

-HOLDAWAY did introductions, advised 9(2)(a) why we were calling.
9(2)(a) confirmed he was owner/operator of business.
9(2)(a) informed 9(2)(a) about residue survey and results
9(2)(a) was aware of the survey and had experience with it in the past
-HOLDAWAY explained Food Safety issue identified
9(2)(a) confirmed using spray on silverbeet, advised product is dispatched, sold through and consumed within a week due to perishable nature
-There would be nothing left in market to recall as this was 3 weeks ago
-The product is not exported
9(2)(a) advised that patch of silverbeet is finished now, the last lot would have gone out over a week ago
9(2)(a) was happy to provide spray diary

From: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>



Sent: Monday, 5 September 2022 4:01 PM

To: 9(2)(a)

Subject: 9(2)(b)(ii) Silverbeet Food Residue Results

Good Afternoon 9(2)(a)

Thank you for your time on the phone this afternoon. As discussed, during New Zealand Food Safety (NZFS) Food Residues Survey Programme, a residue exceeding the applicable maximum residue level (MRL) was found in a Silverbeet sample. On 16 August, a sample of silverbeet was purchased from 9(2)(b)(ii). The sample had the following details: Silverbeet. 12 ct loose pack crate. Tag 1. 9(2)(b)(ii) 9(2)(b)(ii) Block 4. Harvest date: 14/08/22.

The applicable MRL for the methamidophos and Out of residue allowed in the food and average level found in the sample is provided in the following table.

Agricultural chemical (food)	Applicable MRL* (mg/kg)	Average levels found in the sample (mg/kg)
Methamidophos (silverbeet)	0.01	3.6
Out of scope		

It is important to note that Part 6 of the Food Regulations 2015 prohibits the sale of food containing residues that exceed levels specified in a notice. The level of the residue detected in this sample was assessed for dietary risk exposure. There was a food safety risk identified with this sample due to the methamidophos residue found.

When a food safety risk is identified the need to recall the food product from the market needs to be considered. You advised on the phone that you would expect product to be harvested, distributed and consumed within a week due to its perishable nature. Therefore the affected silverbeet would no longer be in the market. You advised the silverbeet is not exported. At this stage we do not need you to complete a recall risk assessment form.

The rules about the maximum residue limits that are permitted on foods sold for human consumption can be found at <https://www.mpi.govt.nz/dmsdocument/19550-maximum-residue-levels-for-agricultural-compounds>

Residues in raw agricultural commodities, such as silverbeet, cannot exceed the applicable MRL under the Food Notice Maximum Residue Levels for Agricultural Compounds. For silverbeet, the New Zealand MRL of 0.01 mg/kg applies for 'Any other food' for residues of methamidophos. Out of scope

In addition, registered agricultural chemical products containing the active ingredient methamidophos (or acephate, which also results in methamidophos residues) must not be applied to silverbeet.

This is because the Environmental Protection Authority of New Zealand and the Ministry for Primary Industries reassessed all organophosphate and carbamate based agricultural compounds in New Zealand in 2015. As a result, the use of these active ingredients was restricted to specific crops on labels and MRLs were significantly reduced. Here is a link to Organophosphate-Carbamate-Reassessment <https://www.mpi.govt.nz/dmsdocument/19490/direct> explaining these changes.

Please provide the following by 3pm tomorrow (6/9/22):



- Photos of the agricultural chemical product labels (front and back) with the active ingredients methamidophos, acephate and metalaxyl applied to the silverbeet. Please ensure the production batch date and spray directions are clearly legible.
- Copies of the spray diary with the application rate and withholding period for the spray diaries harvested and sampled as identified in this letter.

Review your production practices, product labels and spray diaries to ensure that you have not deviated from Good Agriculture Practice (GAP). Please provide the findings of your review and any other relevant information.

Please feel free to contact me if you have any questions. Once you have provided the above information we will be in contact to advise on next steps.

Appendix #2

-Human Health Risk Assessment

Out of scope

-Investigation Plan

Investigator: Kimberly Holdaway

Date: 6-Sep-22

Time: 13:45

Category: Email, Other (i.e. Media Info)

Identifier:

Comments:

Time Taken: 1:00

9(2)(a) provided spray diary and photos of spray label.

HOLDAWAY shared information with ACVM

ACVM reviewed information and records, advised no other concerns noted.

From: 9(2)(a)

Sent: Tuesday, 6 September 2022 1:45 PM

To: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Subject: Re: 9(2)(b)(ii) Silverbeet Food Residue Results

Good Afternoon Kim,

Thank you for that information. I've decided to stop using Metamidophos completely once I've used the remaining 5 litres in stock on broccoli (it's just too troublesome)

Out of scope

Yes in retrospect I should have been out there supervising my worker before harvesting that particular location as ultimately as the owner the buck stops with me, so I've learnt my lesson.

The product concerned was 20 crates (240 heads) from block 4 location f and g (f wasn't sprayed) as we were already harvesting there previously, so it's extremely unlikely it was all of the consignment.

No more product was harvested from G for another 14 days after that because it was still too badly damaged from the hailstorm of 6th June and no further chemical applications were made on it as it remained disease free.

Out of scope

If there's anything else you want to know, feel free to email or ring me.



Regards, Norman

.....

From: 9(2)(a)
Sent: Tuesday, 6 September 2022 3:00 PM
To: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>; Steve Collinson <Steve.Collinson@mpi.govt.nz>; 9(2)(a)
Subject: RE: 9(2)(b)(ii) Silverbeet Food Residue Results

Hi all,
This information confirms what the grower said in the phone call, and he has proposed actions to prevent it reoccurring:

Out of scope

Methamidophos: Methafos 600 (P5915)
Cond 31: This product must only be used as specified in the label content. It does not include silverbeet.
One application was made of Methafos 600 at 1L/ha, on 6/8/22. Silverbeet was harvested on 14/8/2022 = 12 day DALT.

The grower will not use this active ingredient any more after the remaining 5 L product is used on broccoli (an approved label claim).

Out of scope

These actions appear appropriate to prevent reoccurrences from an ACVM perspective.

Kind regards,

9(2)

()

Phone call HOLDAWAY, COLLINSON and BISHOP

-HOLDAWAY provided update on investigation findings



-Agreed action of advisory letter

Appendix #3

-Spray Diary

-Metafos back Label

-Metafos front Label

Out of scope

Investigator: Kimberly Holdaway

Date: 7-Sep-22

Time: 8:05

Category: Email

Identifier:

Comments:

Time Taken: 0:15

Communication with 9(2)(a) - gathering further information on what occurred

From: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Sent: Wednesday, 7 September 2022 8:07 AM

To: 9(2)(a)

Subject: RE: 9(2)(b)(ii) Silverbeet Food Residue Results

Good Morning 9(2)(a)

Thank you for providing the information we requested.

I will give you a call later this afternoon to go over a few things.

15:18 HOLDAWAY phone call to 9(2)(a)

-HOLDAWAY thanked 9(2)(a) for the information he provided. We have reviewed the photos and spray diary.

9(2)(a) explained he doesn't use the spray often, he had that bottle for a few years, only uses in winter.

9(2)(a) explained that he would normally spray but not harvest for 3 weeks, but when the worker was harvesting he was not there at the time and the worker skipped over to the sprayed patch.

9(2)(a) advised it won't ever happen again, I will use it up and not buy any more. I only used it as it was effective against mildew.

9(2)(a) explained he will make sure staff stop and don't harvest past a certain point in the future by using flags to identify where to stop.

9(2)(a) shared the results of the residue survey with his staff and the food safety risk it posed.

-There are no checks of the spray records in comparison to harvest records in place prior to dispatch of product, as 9(2)(a) is the only one that sprays and it is a small business.

Investigator: Kimberly Holdaway

Date: 29-Sep-22

Time: 14:00

Category: Email, Letter

Identifier:



Comments:

Time Taken: 2:00

Drafted advisory letter for 9(2)(b)(ii), sent to ACVM team for review/input

From: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Sent: Thursday, 29 September 2022 2:00 PM

To: 9(2)(a)

Subject: DRAFT Letter 9(2)(b)(ii)

Good Afternoon 9(2)
()

I have put together a DRAFT letter for 9(2)(a). Thank you for providing the ACVM template it was very helpful.

Could you please have a look at the letter, feel free to suggest any changes and add any relevant ACVM legislation.

Investigator: Kimberly Holdaway

Date: 12-Oct-22

Time: 9:20

Category: Email

Identifier:

Comments:

Time Taken: 1:00

ACVM provided feedback on Advisory letter draft

From: 9(2)(a)

Sent: Wednesday, 12 October 2022 9:20 AM

To: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Cc: Karen Booth <Karen.Booth@mpi.govt.nz>

Subject: FW: DRAFT Letter 9(2)(b)(ii)

Hi Kim,

I have made some suggestions below and Karen (ACVM team manager) has also added some comments.

Please let me know if you want to discuss anything.

Thanks,

9(2)
()

Investigator: Kimberly Holdaway

Date: 13-Oct-22

Time: 11:30

Category: Email

Identifier:

Comments:

Time Taken: 1:00

Out of scope

Out of scope



Out of scope



Out of scope



Investigator: Kimberly Holdaway

Date: 20-Oct-22

Time: 14:00

Category: Email, Letter

Identifier:

Comments:

Time Taken: 4:00

Letter sent to 9(2)(b)(ii), copy to verifier and ACVM team

From: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Sent: Thursday, 20 October 2022 2:01 PM

To: 9(2)(a)

Cc: GAP <gap@asurequality.com>

Subject: 9(2)(b)(ii) - Non-compliant MRL result

Good Afternoon 9(2)(a)

Attached is a letter summarising the investigation and outcomes in regards to a residue exceeding the applicable maximum residue level (MRL) was found in a Silverbeet sample from 9(2)(b)(ii) during New Zealand Food Safety Food Residue Survey.

Your verification agency has been copied in for their records.

Appendix #5

-Letter 9(2)(b)(ii) 20.10.22

Investigation Topics



Introduction

Notification received by NZFS Food Compliance Services

New Zealand Food Safety (NZFS) Food Compliance Services were informed by ACVM of a non-compliant MRL results found during the Food Residues Survey Programme (FRSP). The affected sample was silverbeet from 9(2)(b)(ii) [REDACTED]

Discussion

Investigation

The investigation was undertaken by Food Compliance and ACVM.

NZFS conducted a risk assessment, the level of the residue detected in this sample was assessed for dietary risk exposure. A food safety risk was identified with this sample due to the methamidophos residue found. The metalaxyl residue found was at a level higher than the MRL but was not assessed as a food safety risk.

NZFS Food Compliance Services contacted the business, to discuss if any recall action would need to be considered. It was found the affected silverbeet would be sold through at the time of the investigation, due to its perishable nature it would have already been consumed or disposed of.

The business confined spraying methamidophos on the silverbeet, a staff member then harvested the silverbeet.

The spray diaries and photos of the spray labels were provided to NZFS. These were reviewed by the Agricultural, Compounds and Veterinary Medicine (ACVM) team. Records reflected the information provided and clearly showed the source of the methamidophos.

Conclusion

Outcome

No recall action was undertaken.

The business implemented corrective actions, including agreeing to not use sprays 'off label'.

An advisory letter was sent to the business, with input from ACVM.

File Recommendation

Recommendation

I recommend this file to be closed.



Appendix Register

No	Date	Comments
1	5-Sep-22	Appendix Register #1 - silverbeet FRSP methamidophos detection
2	5-Sep-22	-Human Health Risk Assessment Out of scope -Investigation Plan <i>withheld under section 6(c) of the OIA</i>
3	6-Sep-22	-Spray Diary -Metafos back Label -Metafos front Label Out of scope
4	13-Oct-22	Out of scope
5	20-Oct-22	-Letter 9(2)(b)(ii) 20.10.22

Human health risk assessment of residues in silverbeet

Hazard identification

The following residue detections have been reported in silverbeet as part of the Food Residue Programme:

Matrix	Compound	Original result (mg/kg)	Reweight (mg/kg)	Reweight duplicate (mg/kg)	Average result (mg/kg)
Silverbeet	Out of scope				
	Methamidophos	3.4	3.8	3.5	3.6

Out of scope

Methamidophos

Methamidophos (O,S-dimethyl phosphoramidothioate), an organophosphorus insecticide which acts by inhibiting cholinesterase activity, is a racemate and a major metabolite of acephate.

Methamidophos is acutely toxicity when administered orally, with an LD₅₀ of 13–16 mg/kg bw in rats. The clinical signs of toxicity are those typical of cholinergic effects. In short-term studies of toxicity in mice (oral, dermal, intraperitoneal), rats (oral, dermal, inhalation, intraperitoneal), rabbits (dermal) and dogs (oral), methamidophos caused signs of toxicity related to inhibition of cholinesterase activity. In view of the lack of evidence for genotoxicity or for carcinogenic potential in mice or rats, JECFA (2002) concluded that methamidophos is unlikely to pose a carcinogenic risk to humans.

Hazard characterisation

Methamidophos

JECFA (2002) established an ADI of 0–0.004 mg/kg bw on the basis of the NOAEL of 0.1 mg/kg bw per day for inhibition of erythrocyte and brain cholinesterase activity in the 2-year study of toxicity and carcinogenicity in rats and a safety factor of 25. This value is supported by the NOAEL of 0.1 mg/kg bw per day for inhibition of erythrocyte cholinesterase activity in the multigeneration study of reproductive toxicity in rats and by the NOAEL of 0.06 mg/kg bw per day for inhibition of erythrocyte and brain cholinesterase activity in the 1-year study of toxicity in dogs.

JECFA (2002) established an acute RfD of 0.01 mg/kg bw on the basis of the NOAEL of 0.3 mg/kg bw for inhibition of erythrocyte and brain cholinesterase activity in the study of neurotoxicity in rats given single doses and a safety factor of 25. The results of the study in volunteers were supportive of both the ADI and the acute RfD because methamidophos did not cause toxic effects other than those associated with, or secondary to, inhibition of cholinesterase activity.

EPA NZ has set the ADI at 0.0001 mg/kg bw per day.

Exposure assessment and risk characterisation

No chronic dietary exposure is expected as this is a one-off residue detection.

No specific consumption values are available for silverbeet in New Zealand, therefore to estimate the acute exposure, the population high (97.5th percentile) consumption values for leafy vegetables in the relevant New Zealand nutrition surveys were used; 242.4 g/day for adults and 148.2 g/day for children. Normalising this to an 82 kg adult male and a 23 kg 5-6 year old child delivers intake values of 3 g/kg bw and 6.4 g/kg bw respectively

Crop	Compound		Residue (mg/kg)	Acute est. exposure (µg/kg bw/d)	% of ARfD
Silverbeet (Leafy vegetables)	methamidophos	Adult	3.6	10.64	106.4
		Child	3.6	23.20	232.0

Risk Characterisation

Dietary exposure assessment of methamidophos residue detected in silverbeet sample identifies that the concentration is above the ARfD established by JECFA.

It is noted that no specific consumption values are available for silverbeet in New Zealand are available. Using the residue detection of 3.6mg/kg in the silverbeet sample, a child (23kg) needs to eat 64 gram/d or less of silverbeet to not exceed the ARfD, an adult (82kg) need to consume 228 gram/d or less not to exceed the acute HBGV.

This means a human health food safety risk for children cannot be excluded.

9(2)(a)

01.09.2022

Released under the Official Information Act 1982

GENERAL INFORMATION

Methafos 600 is a contact and systemic organophosphate insecticide that acts on the nervous system of insects by contact action and as a stomach poison when ingested. **Methafos 600** is active against a broad range of chewing and sucking insect pests.

IMPORTANT - RESISTANCE MANAGEMENT

Methafos 600 contains the [Methafos 600] methamidophos. Resistance to pesticides can develop from excessive use. To minimise this risk, avoid using this insecticide exclusively all season, avoid unnecessary spraying and endeavour to alternate with insecticides from other groups within the crop and in subsequent seasons for a sprayed paddock. Use strictly in accordance with label instructions. Maintain good cultural practices.

COMPATIBILITY

Methafos 600 is compatible with most commonly used insecticides and fungicides. It should not be mixed with highly alkaline materials such as Bordeaux mixture or lime sulphur.

IT IS AN OFFENCE TO USE THIS PRODUCT OFF-LABEL.

Methamidophos residues can occur as a breakdown of acephate use on treated crops. Avoid the use of both acephate and methamidophos products on the same crop in the same season to ensure compliance with "Maximum Residue Limits".

MIXING

Partly fill the spray tank and start agitation. Add the required amount of **Methafos 600**. Complete filling the spray tank and maintain agitation until spraying is complete.

RECOMMENDATIONS

The rates suggested are for boom spray application in sufficient water to obtain thorough coverage of all parts of treated plants. NOT to be applied to covered crops. NOT to be applied by motorised or hand operated knapsacks.

MAXIMUM APPLICATION RATE

This product may be applied at a maximum rate of 1.5 Litres/ha (900g a.i.)

It is an offence for users of this product to cause residues exceeding the relevant MRL in the Food Notice: Maximum Residue Levels for Agricultural Compounds.

WITHHOLDING PERIODS

Sweetcorn	14 days
Brussels Sprouts, Broccoli, Cabbages, Cauliflowers.	14 days
Kumara, Maize, Onions & Potatoes	14 days
Tamarillos	42 days

CONDITIONS OF SUPPLY

All goods supplied by us are produced under strict quality control procedures which assure the purchaser that at the time of sale they are physically suitable for use in the manner stated. However, to the extent permitted by law, buyers and/or users of the goods accept that neither the manufacturer, Agri Solutions Ltd as registrant, nor any other distributor have any liability or responsibility whatsoever for any loss, damage or injury whether in contract or tort, whether direct, indirect or consequential howsoever arising in connection with the supply of these goods.

Registered pursuant to the ACVM Act 1997 No. P591
See www.foodsafety.govt.nz for registration conditions

Approved pursuant to HSNO Act 1996 No. HSR00022
See www.epa.govt.nz for approval conditions



APPLICATION RATES

CROP	PEST	RATE	REMARKS
Kumara	Adult White Fringed Weevil & Adult Black Beetle, Caterpillars	Up to 1.1L/ha in 250-500L of water/ha	Apply every 14-21 days, beginning at the first appearance of activity. Maximum of 4 applications per season. Control of tuber mite is assisted by maintaining moisture at an adequate level by irrigation and good soil coverage over developing tubers.
Maize, Sweetcorn	Army Caterpillar, Green Vegetable Bug, Tomato Fruit Worm	1.0L/ha	Apply by aircraft when crop monitoring shows treatment is required. Consult the supplier or adviser for details of the monitoring systems. Use sufficient water to ensure thorough coverage and penetration into the crop canopy. Maximum of 2 applications.
Onions	Onion Thrips	1.0L/ha in 500-900L of water/ha The use of a wetting agent is recommended	Apply when monitoring shows numbers exceed recommended action threshold level. Apply applications at weekly intervals (3 maximum). Ensure thorough coverage. If further treatments are required, use an insecticide with a different active ingredient.
Potatoes	Aphids	600mL/ha	Apply at the first appearance of aphids and repeat at 14-21 day intervals. Maximum of 4 applications.
	Potato Tuber Moth, Tomato/Potato Psyllid	1.0L/ha	Apply at the first sign of infestation and repeat at 14 - 21 day intervals. Maximum of 4 applications. Good soil coverage of developing tubers and moist soil conditions assist in the control of tuber moth.
Tamarillos	Tomato/Potato Psyllid	150mL/100L water and 500-900L/ha - see remarks	Apply 14 days apart. Adjust water rate depending on the amount of foliage. Maximum of 2 applications per season.
Vegetable Brassicas	Diamond Back Moth, White Butterfly & Large Caterpillar	1.0-1.5L/ha	Apply from emergence or planting out, repeat at 7-10 day intervals. Maximum of 2 applications.

REGISTRANT

Agri Solutions Ltd.
Level 1, 26 Crummer Road
Grey Lynn, Auckland 1027

DISTRIBUTOR

AgriSource (2000) Ltd,
45 Kitchener Road, Pakuranga 2120
Tel 237 0422 / www.agrisource.co.nz

BATCH NO: 211020

DATE OF
MANUFACTURE: 2021.10.20

METHAFOS 600

**A systemic organophosphorous
insecticide for the control of aphids,
caterpillars and other chewing
and sucking insects**

GROUP	1	INSECTICIDE
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Contains 600g/litre methamidophos in the form of a soluble concentrate



AGRISOURCE
PRODUCTS FOR AGRICULTURE

**COMBUSTIBLE
LIQUID
TOXIC
WARNING
ECOTOXIC**

Keep out of the reach
of children

Net Contents

10 Litres



Out of scope

Released under the Official Information Act 1982

From: [GAP](#)
To: [Kimberly Holdaway \(Kim\)](#)
Subject: RE: 9(2)(b)(ii) [REDACTED] NZGAP-s40-00005- MPI request for reports
Date: Thursday, 13 October 2022 11:26:52 am
Attachments: [image004.png](#)
[image001.png](#)
9(2)(b)(ii) [REDACTED] [NZGAP audit report 2017.pdf](#)
[NZGAP audit report 2019.pdf](#)

Hi Kimberley

He's finally replied and given approval so here are the last two audit reports.

Kind regards

9(2)(a) [REDACTED]

AsureQuality Limited, Christchurch
Private Bag 14946, Christchurch 1741



From: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>
Sent: Friday, 7 October 2022 2:36 p.m.
To: GAP <gap@asurequality.com>
Subject: RE: 9(2)(b)(ii) [REDACTED] NZGAP-s40-00005- MPI request for reports

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi 9(2)(a) [REDACTED]

In this situation the operator is aware we have been conducting an investigation, I am happy for them to be informed of our request.

Kind regards,

Kimberly Holdaway | Senior Food Compliance Officer
Food Compliance & Response | New Zealand Food Safety - Haumaru Kai Aotearoa
Ministry for Primary Industries - Manatū Ahu Matua | 40 Bouverie Street, Petone 5012 | PO Box 38090 Petone 5045 | New Zealand
9(2)(a) [REDACTED] | Web: www.mpi.govt.nz

From: GAP <gap@asurequality.com>
Sent: Wednesday, 5 October 2022 1:10 PM

To: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Subject: RE: 9(2)(b)(ii) [REDACTED] NZGAP-s40-00005- MPI request for reports

Hi Kimberley

I am so sorry to have taken this long but I have been trying to check which report I can send to you and I was told I have to ask the customer's permission. Is that alright with you as I don't want to alert them if you are wanting this to be done without them knowing.

Kind regards

9(2)(a) [REDACTED]

AsureQuality Limited, Christchurch
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From: Kimberly Holdaway (Kim) <Kimberly.Holdaway@mpi.govt.nz>

Sent: Monday, 5 September 2022 1:20 p.m.

To: Food <Food@asurequality.com>

Subject: 9(2)(b)(ii) [REDACTED] NZGAP-s40-00005

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Good Afternoon,

Could you please provide the last 2 verification reports for 9(2)(b)(ii) [REDACTED]

Kind regards,

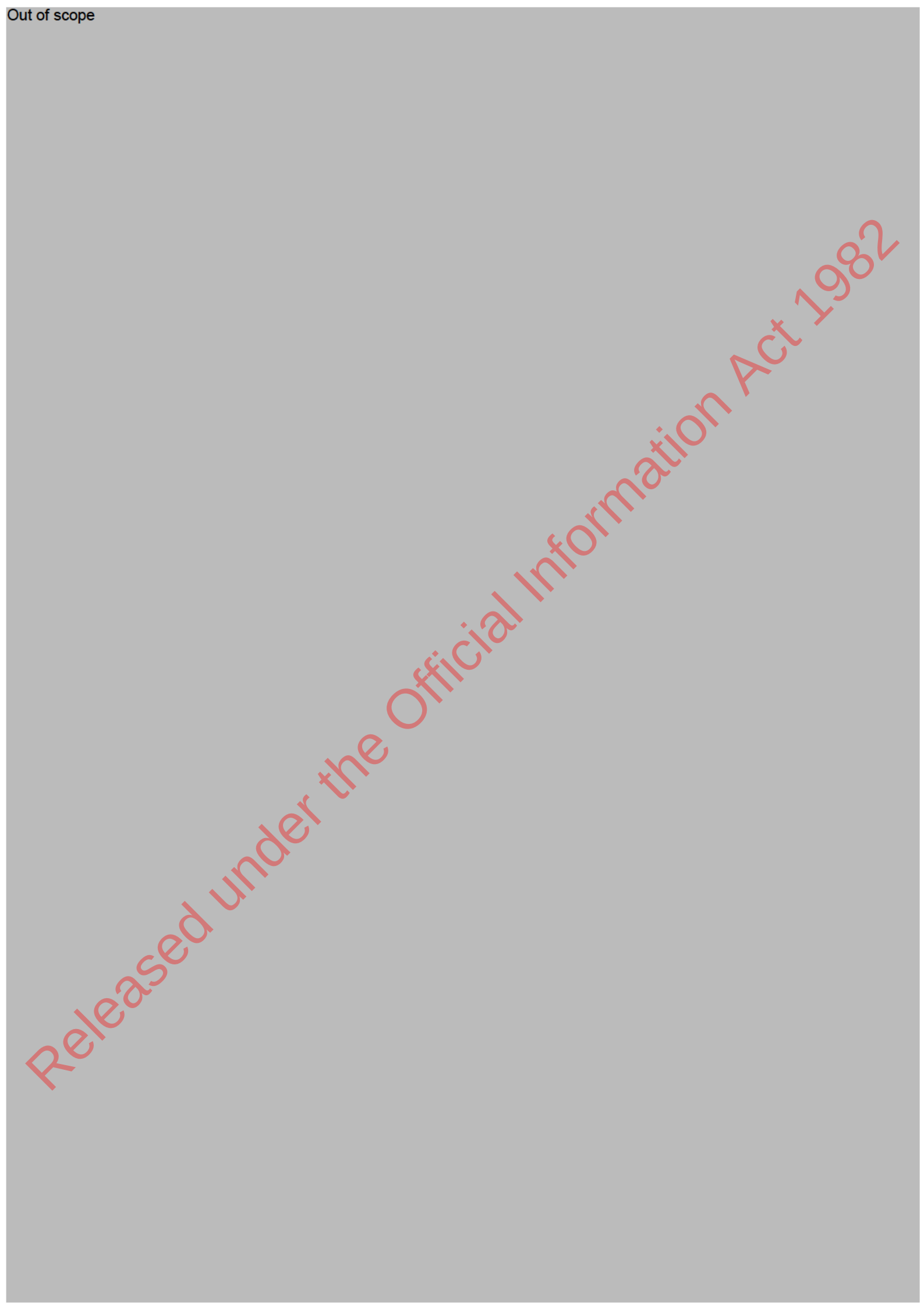
Kimberly Holdaway | Senior Food Compliance Officer

Food Compliance & Response | New Zealand Food Safety - Haumaru Kai Aotearoa

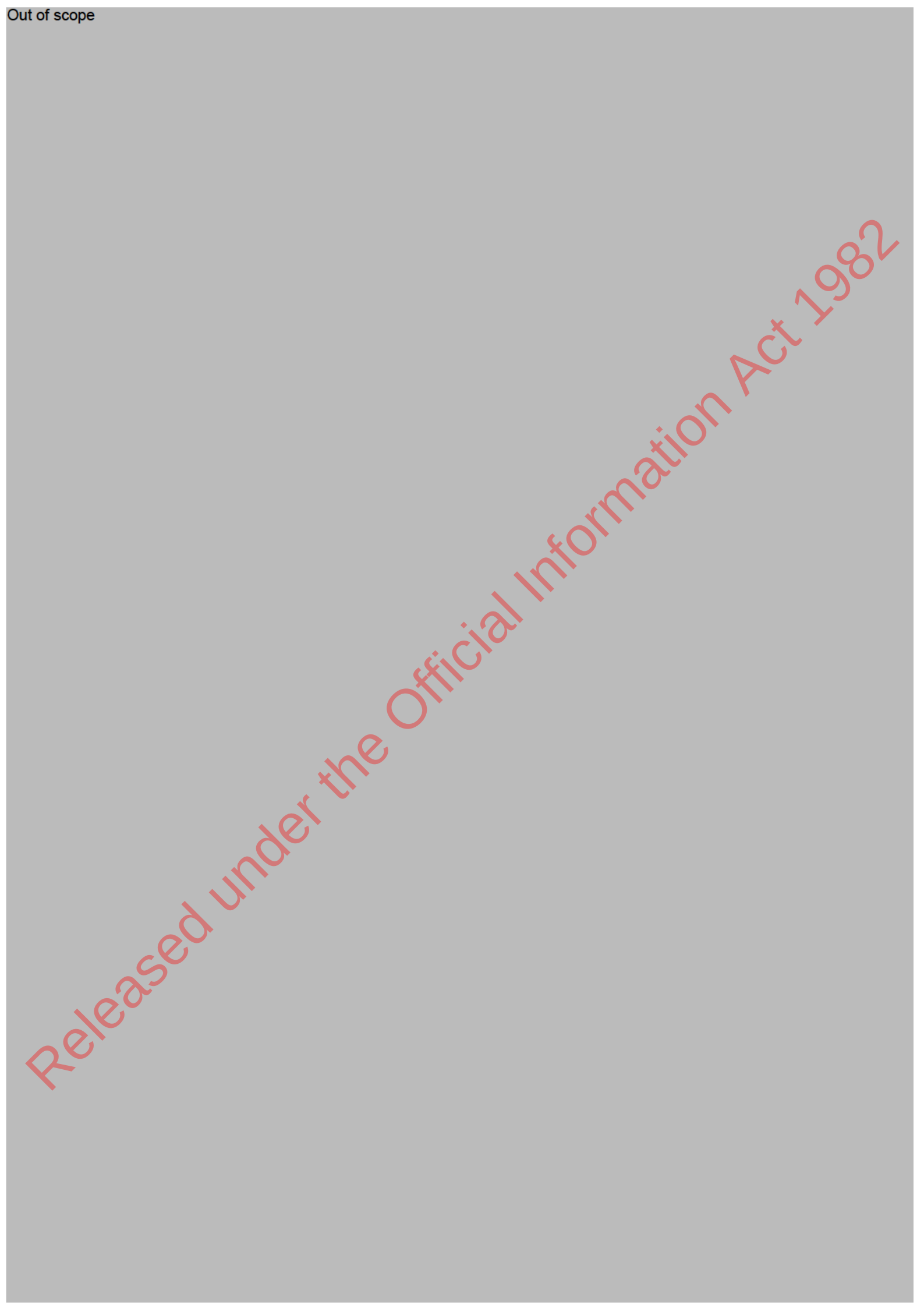
Ministry for Primary Industries - Manatū Ahu Matua | 40 Bouverie Street, Petone 5012 | PO Box 38090 Petone 5045 | New Zealand

9(2)(a) [REDACTED] | Web: www.mpi.govt.nz

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20 October 2022

9(2)(a)
9(2)(b)(ii)

Dear 9(2)(a)

MPI reference: IL FAO 10923

This letter summarises the investigation into a silverbeet sample from 9(2)(b)(ii) that exceeded the applicable maximum residue level (MRL).

Background

New Zealand Food Safety (NZFS) Food Compliance Services were informed of non-compliant MRL results found during the Food Residues Survey Programme (FRSP). The affected sample was silverbeet from 9(2)(b)(ii)

The applicable MRL for the methamidophos and Out of residue allowed in the food and average level found in the sample is provided in the following table.

Agricultural chemical (food)	Applicable MRL* (mg/kg)	Average levels found in the sample (mg/kg)
Methamidophos (silverbeet)	0.01	3.6
Out of scope		

Investigation

NZFS conducted a risk assessment, the level of the residue detected in this sample was assessed for dietary risk exposure. A food safety risk was identified with this sample due to the methamidophos residue found. Out of scope

NZFS Food Compliance Services contacted you with this information, to discuss if any recall action would need to be considered. You advised the affected silverbeet would be sold through at the time of the investigation, due to its perishable nature it would have already been consumed or disposed of.

You informed us that you sprayed methamidophos on the silverbeet, a staff member then harvested the silverbeet.

The spray diaries and photos of the spray labels were provided to NZFS. These were reviewed by the Agricultural, Compounds and Veterinary Medicine (ACVM) team. Records reflected the information you provided and clearly showed the source of the methamidophos.

Corrective actions undertaken

- Methamidophos will not be used on silverbeet, and you have advised you will not buy any more of the product
- Staff were informed of the issue and the investigation
- The use of flags is being considered, to use as markers out in the field so staff can easily identify where to pick when harvesting.

What the law says

New Zealand Food Safety would like to remind you of your obligations under the Food Act 2014.

Under section 14 *Primary duty of persons who trade in food*, a person who trades in food must ensure that it is safe and suitable. It is an offence under this Act, to sell unsafe food.

The requirements about the maximum residue levels (MRLs) that are permitted on foods sold for human consumption can be found here: <https://www.mpi.govt.nz/dmsdocument/19550-Maximum-Residue-Levels-for-Agricultural-Compounds>

Under the ACVM Act 1997, registration conditions are imposed for registered agricultural chemicals.

Out of scope

However, registered agricultural chemical products containing the active ingredient methamidophos can only be applied according to the label. This is a condition of the product registration and is stated on the product label.

This restriction is because the Environmental Protection Authority of New Zealand and the Ministry for Primary Industries reassessed all organophosphate and carbamate based agricultural compounds, including methamidophos, in New Zealand in 2015. As a result, the use of these active ingredients was restricted to specific crops on labels and MRLs were significantly reduced. Here is a link to Organophosphate-Carbamate-Reassessment <https://www.mpi.govt.nz/dmsdocument/19490-OrganophosphateCarbamate-Reassessment> explaining these changes.

Outcome

No recall action was undertaken. Corrective actions were implemented by management on site.

You must ensure you read and follow product labels carefully in future, and ensure all MRLs are met.

A copy of this letter has been sent to AsureQuality, the verification agency of your Food Control Plan NZGAP, for their information. This information is shared under section 369 of the Food Act 2014, on the condition that the information disclosed is kept confidential.

Please feel free to contact me on 9(2)(a) or email Kimberly.Holdaway@mpi.govt.nz if you have any questions.

Yours sincerely

9(2)(a)

Kimberly Holdaway
Food Compliance Officer 74204

CC: AsureQuality

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