



**ORTA ANADOLU HUBUBAT
BAKLIYAT YAĞLI TOHUMLAR
İHRACATÇI BİRLİKLERİ**

Sayı: 79316202-TİM.OAİB.06.ARG3.2022/1209-7717
Konu: Susam Ürünlerinde Tespit Edilen Pestisit Kalıntısı Hk.

Ankara, 9/08/2022

SİRKÜLER (H-2022)

Sayın Üyemiz,

Japonya'nın önde gelen susam ithalatçılarının üyesi olduğu JOFIEA (The Japan Oil & Fat Importers & Exporters Association) Susam İthalatçıları Komitesi'nden, ülkemizden ithal edilen susam ürünlerinde son dönemde tespit edilen pestisit kalıntısının arttığına ilişkin bir mektup alınmış olup, mektubun bir örneği ekte dikkatinize sunulmuştur.

Mektupta özetle, Japonya'nın dünyanın en büyük ikinci susam ithalatçısı olduğu, bu alanda Türkiye ile güçlü iş ilişkilerinin bulunduğu, ancak son dönemde diğer ihracatçı ülkelerin yanı sıra ülkemizden ithal edilen susam ürünlerinde Japon mevzuatının belirlediği oranın üzerinde pestisit kalıntısı tespit edilmesi nedeniyle büyük endişe duydukları belirtilmektedir. Mektupta ayrıca, pestisit kalıntısı ve aflatoksin tespitine ilişkin Japonya'daki denetim sistemi hakkında bilgi verilmekte olup, yerel sağlık birimlerinin, toptancıların veya ilgili diğer birimlerin de gerekli gördükleri durumlarda gönüllü denetim gerçekleştirmelerinin son derece yaygın olduğu dile getirilmektedir.

Maksimum kalıntı limitinin üzerinde kalıntı tespit edilmesi durumunda ise ürünler için bertaraf, menşesine iade vb. önlemlerin alınması gerektiği ve bu durumun devam etmesi halinde ülkemiz menşeli susamların itibarının zedelenebileceği ve fiyat rekabet gücünün de azalabileceği ifade edilmektedir. Son olarak ülkemiz susam ihracatçılarından bu sorunu ciddiye almaları konusunda uyarılmaları ve pestisit kalıntılarının temel nedenini belirlenmesi için gerekli çalışmaların ve sorunun giderilmesi için gerekli önlemlerin alınması talep edilmektedir.

Bilgileri ve gereğini rica ederim.

Özkan AYDIN
Genel Sekreter

Ekler:

1- JOFIEA'dan alınan mektup

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June 3, 2022

Embassy of Republic of Turkey

Re: The increase of the pesticides residue on sesame imported to Japan

Dear Sirs,

We are writing this letter to advise you our serious concern on the risk of pesticides residue for sesame imported to Japan. Japan is the second largest importer of sesame in the world, and have a strong trade relationship with Turkey through sesame as well as other products. That being said, due to drastic increase in the number of detection of pesticides residue exceeding Japanese regulation from Turkish sesame, we, Sesame Importers Committee of the Japan Oil & Fat Importers & Exporters Association (JOFIEA), are strongly concerned about the future of the sesame trade with Turkey, as well as other sesame exporting countries. We would highly appreciate if you could treat this problem seriously and discuss the corrective actions with Turkish sesame exporters.

In order to protect consumers, pesticide residues in foods are strictly controlled in Japan under positive list system, and sesame is not an exception.

More specifically, sesame firstly must go through (I)Pesticide Residue / Aflatoxin Inspection by the Japanese Government, when requested by Japanese Ministry of Health, Labor and Welfare (MHLW). Additionally, (II)Voluntary Inspections by processors / trading houses are always carried out before custom clearance and delivery to the processors.

I. Pesticides Residue / Aflatoxin Inspection by the Japanese Government

Based on the Imported Foods Monitoring and Guidance Plan, the MHLW orders importers to carry out one of the following inspections of imported foods. Pesticides residue and Aflatoxin are subject to those inspections.

(i) Inspection Order:

Inspection Order is an order that requires importers to have imported items (including sesame) with a high risk of violating the Food Sanitation Act (Act) inspected, each time of the import. Items can be subject to inspection order once the violation with the Act incurs, and will get excluded if they do not violate the Act for a certain period (most cases more than one year). The regulation differs by the origin country of the item, and sesame from Tanzania and Paraguay are subject to inspection order as of March 14, 2022.

Please refer to the following to see the detail.

<https://www.mhlw.go.jp/english/topics/importedfoods/21/appendix1.html>

(ii) Monitoring Inspections:

Monitoring Inspections are implemented at random, not every time, for the purposes of monitoring safety conditions of various foods. Sesame of all origins are subject to monitoring inspections. In the case of any violation, necessary measures will be introduced such as enhanced inspections on importation (such as Inspection Order).

II. Voluntary Pesticides Residue / Aflatoxin Inspection by user/importer

In addition to the inspection by the government, Voluntary Inspections of Pesticides Residue / Aflatoxin are implemented by processors (manufacturers of sesame products) and importers (trading houses). In Japan it is quite common that the pesticide residues of any processed foods are randomly inspected by local health care centers and retailers.

Since various kinds of pesticide residues that exceed Maximum Residue Limit (MRL) have been detected in the result of the random inspections on sesame products such as sesame oils, processors and importers of sesame have no choice but to conduct Voluntary Inspections on each shipment of sesame as a preventive action, in order to confirm the safety of imported sesame.

Unfortunately, it is confirmed that the excess of MRL from the sesame imported to Japan has been drastically increased. Based on the examination conducted by the JOFIEA for the sesame imported to Japan from 2019 to 2021, the excess of MRL in 2021 was 1.9 times as much as in 2019. For reference, following is the latest MRL of pesticides on sesame : https://db.ffcr.or.jp/front/food_group_detail?id=12100

We would like to emphasize that, when excess of MRL is confirmed, the measures such as disposal and ship-back have to be taken for the sesame. If this trend continues, it may damage the reputation of Turkish sesame, and may also reduce the price competitiveness of Turkish sesame as pesticide risk can be considered as potential cost.

In order to maintain the strong relationships with customers in Japan, we strongly ask you and Turkish sesame exporters to treat this problem seriously and to take necessary measures to improve the situation, such as investigations to determine the root cause of pesticide residues and enhanced inspections of sesame at Turkey.

Sincerely,



Yoshitomo Yamada
Chief of Sesame Importers Committee of JOFIEA
(ITOCHU Corporation)