

Current status of the Neonicotinoid insecticides (Clothianidin, Imidacloprid and Thiamethoxam) within the EU

This Cutting Edge seeks to outline the legal and operational implications of additional restrictions placed on uses of Clothianidin, Imidacloprid and Thiamethoxam within the EU on Southern African citrus production and citrus fruit exported to the EU from South Africa.

Legal Status: Authorized usages within the EU.

On the 15th March 2013 the Standing Committee on the Food Chain and Animal Health (Pesticides Legislation Section) considered a proposal to restrict authorisations of neonicotinoid insecticide products containing clothianidin, imidacloprid and thiamethoxam. When put to the vote, the proposal could not be adopted or rejected (i.e. “no opinion”) and was therefore deferred to an Appeal Committee. An Appeal Committee considered the proposal on the 29th April 2013 again and there did not reach a qualified majority in favour or against. Since the Member States could not reach consensus on the proposal the responsibility to adopt or reject the proposal fell to the European Commission (EC). It was the decision of the EC to adopt the proposal.

The relevant aspects of the proposal are:

- the withdrawal of professional uses of clothianidin, imidacloprid and thiamethoxam on crops considered attractive to bees within the EU. Citrus is considered “attractive to bees”;
- the complete withdrawal of amateur uses of these substances;
- a prohibition of the sale and use of all seeds for those crops treated with the three active substances from 1st December 2013, other than for research and development within the EU;
- exemptions to allow use on crops harvested before flowering (such as brassicas and onions), use in greenhouses and foliar applications after crops have flowered within the EU;
- a commitment by the Commission to starting a review of further data to be supplied by companies two years after the Regulation comes into force.

None of the above restrictions apply for citrus fruit produced outside of the EU. Within South Africa there are currently no additional restrictions, other

than those already stipulated on the product labels, for the use of these neonicotinoids. Only the EU has introduced such usage restrictions for producers within their own countries regarding Neonicotinoids.

Legal Status: Fruit with clothianidin, imidacloprid and thiamethoxam residues entering the EU.

The status of the EU MRLs for clothianidin, imidacloprid and thiamethoxam remains unchanged. There have been no official notifications to amend the existing MRLs. Fruit entering the EU will need to comply with these pre-existing MRLs.

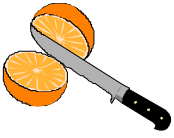
Since this is a matter of environmental concern and not a food safety issue, before the EU changes the MRL the EU would need to notify trading partners of any intention to lower the MRL. This process can take a few months. Add to that time the internal processes of adopting proposals to change the MRL, approvals and final publications, and time given to come into force, new MRL levels will typically only apply more than 8-12 months after first notification. This suggests that the current EU MRLs are likely to apply for the next citrus production cycle, at least, if not for much longer.

CGA is not aware of any notifications from other countries to reduce the MRLs for these three neonicotinoids.

Given that the withdrawal of authorized usage for these neonicotinoids is for use within the EU only and that the MRL is unlikely to be changed, CGA/CRI intend to keep the Recommended Usages Restrictions for clothianidin, imidacloprid and thiamethoxam for the EU and other markets unchanged.

Production Implications

CGA members have raised concerns about the impact restrictions on South African imidacloprid registrations might have on controlling psyllid, the vector for African greening. If left unmanaged African greening is a devastating disease that leads to rapid decline in citrus production, to the point of citrus production unit economic collapse. Historically, only since the availability of systemic insecticides such as imidacloprid has it been possible to reverse or halt the decline in production in regions affected by African Greening. It will therefore be of some relief to the growers in Greening-affected regions to learn that the official changes to the status of imidacloprid



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should not impact on their ability to supply the EU market.

However, at this stage suppliers to Waitrose should note the specific requirements of supplying that retailer, which includes the prohibition of imidacloprid uses.

In June 2013 CGA/CRI will be engaging the Registrar of Act 36 of 1947 regarding the future status of these neonicotinoids. This is part of a routine engagement with the Registrar to discuss matters relating to the citrus industry. Should there be any significant changes in the position of the Registrar on current neonicotinoid registrations CGA/CRI will duly notify the citrus industry.

Kind regards
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