



CONSUMER ASSURANCE & MRL UPDATE

EU Banning of Neonicotinoids (i.e. Imidacloprid)

Some confusion regarding the future use of Imidacloprid on export citrus to the EU has emerged following the publication of EU regulations withdrawing the authorization for use of some Neonicotinoids in the EU (EU/783/2018, published on the 30th May 2018), and some retailers advising their supply base in southern Africa of these developments.

To clarify the situation the following points are relevant:

- EU regulation EU/783/2018 is restricting the use of Imidacloprid uses within the EU, and specifically those uses other than in permanent greenhouses. It does not directly affect the use of Imidacloprid on product destined for the EU produced in southern Africa.
- The registered use of Imidacloprid within South Africa under Act 36 of 1947 is unchanged.
- The EU Imidacloprid MRLs remain as they are and therefore remain as the applicable residue tolerance for citrus exported to the EU.
- The CGA/CRI Recommended Usage Restrictions document has taken these factors into consideration and following those recommendations will result in compliance with the EU MRL requirements.

It is foreseen that retailers and buyers may seek to encourage their supply base to move away from using the neonicotinoid products on the basis of the publication of EU/783/2018, however this misguided pressure would be outside the legal requirements and may also be counter-productive in the long run.

However, it is expected that the Commission will review the Imidacloprid MRLs in light of all new information and at that stage adjust the MRLs. Should this happen it will have implications for the use of Imidacloprid used for citrus to be exported to the EU.

Propiconazole MRL in Japan

The Japanese Ministry of Labour, Health and Welfare (MHLW) set new Propiconazole MRLs for citrus on the 3rd July 2018. The new level applicable for citrus exported to Japan is 8.0 mg/kg. However, as of the 4th July 2018 the list of designated Food Additives in Japan did not reflect Propiconazole as

an approved food additive. The implication is that post-harvest uses of Propiconazole are not permitted despite the fact that these uses may well result in residues that will comply with the new MRLs. Once Propiconazole is recognized as a designated Food Additive the post-harvest use of the product will be permitted.

This set of circumstances also raises some further challenges regarding the mandatory labelling of post-harvest treatments. The citrus industry has agreed to follow consistent post-harvest treatment labelling to avoid the situation where buyers “trade off” exporters based on their willingness to reduce the post-harvest treatment list (irrespective of the consequences for the future sustainability of the trade). It would be inappropriate to add Propiconazole to the standard declaration until Propiconazole is recognized as a Food Additive.

Pre-harvest registration of 2,4-D

Pre-harvest use of 2,4-D has been registered specifically to assist with reduction of the Navel ends and control of Navel-end rot (in combination with other fungicides). The Recommended Usage Restrictions document will be updated to reflect these registrations, which includes a 7 day pre-harvest interval (PHI). Please contact the CRI for more information about this registration.

Microbial contaminants (Listeria) testing for all grains, fruits and vegetables to Egypt

Growers and exporters sending fruit to Egypt are now required to conduct microbial contamination testing and provide appropriate evidence of compliance with each consignment. Should you be sending fruit to Egypt please obtain a copy of the DAFF notice in this regard from the CGA office.

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