



CONSUMER ASSURANCE & MRL UPDATE

IMAZALIL EU MRL

During a visit to the EU in September 2018 CGA became aware that the EU MRLs for Imazalil were being re-evaluated. The underlying reason for re-evaluation was that concerns had been raised about the genotoxicity of one of the metabolites (R014821) that can occur during post-harvest treatments.

On 30th October 2018 the European Food Safety Authority (EFSA) released a further Reasoned Opinion where they effectively indicate there is insufficient data to rule out any toxicological concerns and recommended to the European Commission (EC) that MRLs for post-harvest uses be lowered.

In December 2018 CGA engaged the EC again and the following information was provided, which reflects what is currently believed to be the most likely scenario going forward:

- 1) Consumer protection remains a priority for the Commission, and they need to act in a manner consistent with other previous decisions taken in similar situations.
- 2) The current proposal drafted by the Commission is to reduce the Imazalil MRLs to LOD for post-harvest treatments (i.e. 0.01 mg/kg).
- 3) This proposal will be reviewed by member states at the next Standing Committee on pesticide residues due to take place in February 2019.
- 4) It is most likely that the majority of member states will vote in favour of the proposal which will then trigger the legal proceedings to change the MRLs, which includes notifications via the WTO.
- 5) It is expected that this legal process could take approximately six months so new MRLs could be published in August 2019 with a transitional measure.
- 6) Given the significant impact of these MRL changes the likely transitional measure will be a 180-day phase in period.
- 7) This means new lower Imazalil MRLs for citrus will likely come into force in February 2020.

At this stage the data gaps identified by EFSA could conceivably be filled, but generating the data could take up to 24 months. Applications for new MRLs could only then be submitted and the

process of establishing revised higher MRL initiated. Revised higher MRLs are therefore unlikely to be published before 2021.

These developments are of course a massive setback for post-harvest waste control with wide-reaching consequences. In early 2019 CGA and CRI will be engaging with key role-players to limit the impact of these changes on the ability to supply high quality fruit to markets around the world.

DITHIOCARBAMATES (MANCOZEB) SOUTH KOREAN MRL

In October 2018 CGA advised of the introduction of the positive list system for managing MRLs in South Korea. At the time the Recommended Usage Restriction for Dithiocarbamates was revised to comply with a lower MRL anticipated to come into effect on the 1st January 2019. In October CGA also initiated engagement to obtain additional details on how the system would be implemented. Delayed feedback from this engagement was recently able to confirm that the temporary Dithiocarbamate MRLs will be in place until December 2021.

CGA and CRI will therefore revise the Recommended Usage Restrictions for Dithiocarbamate uses for product destined to South Korea in 2019: **Not later than end of January for oranges and 21d PHI or 28d PHI as registered for soft citrus, grapefruit and lemons.**

GLUFOSINATE PRECAUTIONARY

Detections of a metabolite of the herbicide Glufosinate in the EU during 2018 raise a concern about the potential for further detections of this metabolite on citrus exported to the EU in 2019. There are no residue tolerances for these metabolites on citrus. Therefore, growers using Glufosinate are advised to become aware of the potential consequences of Glufosinate use and to engage their herbicide supplier around the product. This precautionary is being sent out given the expectation of more targeted residue testing in the EU during 2019 is possible.

CONCERN ON STROBILURIN-BASED FUNGICIDE OFF-LABEL APPLICATIONS

CropLife South Africa approached CGA concerning complaints that there is a trend of strobilurin-based fungicides being applied as stand-alone spray applications, rather than as part of a tank mixture application as per registered label texts, for the control of Citrus Blackspot



disease. This practice, seemingly based on advice from certain consultants and sales agents, should be discontinued. A copy of the letter is available from CGA for interested parties.

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21 November 2018