



CONSUMER ASSURANCE UPDATE

MRL Changes in China

There are two important recent changes to the Chinese official MRLs that may impact fruit being sent to China in 2020.

- **2,4-D:** The 2,4-D MRL for oranges and soft citrus has been lowered to 0.1 mg/kg, while for grapefruit and lemons the MRLs remain at 1.0 mg/kg. It is understood that under certain conditions residues below 0.1 mg/kg can be achieved. Packhouses should carefully evaluate their historic analytical data for 2,4-D to see what typical residues result from packing in their situation, noting variations in residue levels that may naturally occur, and plan for the 2020 season accordingly. The Recommended Usage Restrictions will be updated to reflect this lower MRL highlighting the need to use 2,4-D in a manner that results in residues below this level for China.
- **Azoxystrobin:** The Azoxystrobin MRL for oranges has been changed to 1.0 mg/kg. This new MRL is above the previous RSA MRL of 0.5 mg/kg that applied for pre-harvest uses of Azoxystrobin. With the recent registration of post-harvest uses of Azoxystrobin however, the RSA MRL has increased to 10.0 mg/kg. There is a risk that post-harvest treatments of citrus fruit destined for china may exceed the 1.0 mg/kg MRL and the Recommended Usage Restriction will be adjusted to reflect this situation for China: "China: Post-Harvest: Not permitted".

Saudi Arabia – Conditions of clearance (SOP)

Since mid-July CGA and the Fresh Produce Exporters Forum (FPEF) have been engaging with DALRRD and other relevant parties regarding the implementation of new import requirements set out by Saudi Arabia. The introduction of these requirements was postponed until 24th February 2020. The nature of the engagement with DALRRD has been about the implementation of the "Conditions of Clearance of Fruits and Vegetables to Saudi Arabia" issued by DALRRD: FSQA. These conditions are now in play – please obtain a copy from CGA if you did not receive the earlier emails.

CGA raised concerns about the practicality, costs, administrative and logistics complications and feasibility of implementing the requirements. In recent meetings DALRRD were seeking more

specific details on the challenges being faced by growers, packhouses and exporters. It has not been possible to collect such information until the citrus season begins and fruit starts to flow. CGA is therefore appealing to citrus growers, packhouses and exporters to communicate to the CGA office concerns and specific problems associated with these conditions. It would be especially helpful to know if there are any delays drawing samples, obtaining analysis results, waiting for Food Safety Certificates, etc. A case can then be made to review the requirements based on actual evidence, with the idea to address the issue before heavy citrus volumes begin to flow.

EU Chlorpyrifos MRL

The EU Chlorpyrifos MRLs are to be lowered but some uncertainty around when these new MRLs will come into force in the EU has remained. Currently there is still no exact date of enforcement but the process to reduce the MRL is moving forward, providing an indication of when new MRLs will apply. In February 2020 Member States formally voted in favour to lower the MRLs to limit of detection on citrus, which now triggers a legal procedure the Commission must follow to change the MRLs. During direct engagement with the Commission in February 2020, the Commission was able to explain that under typical MRL-setting processes for active substance in the situation that Chlorpyrifos is in, the current expectation is the new lower MRLs will come into force in September 2020. CGA will communicate any deviations from this expected timeline if necessary and as more information is known.

EU Propiconazole MRL

The anticipated future status of the Propiconazole MRL on citrus has also been communicated (i.e. expected to be reduced to level of detection). The actual changes however will only be considered after the grace period for Propiconazole uses within the EU expire (19th March 2020). CGA was advised to expect more information from that point on, but the process will take a number of months from then.

UK MRL UNDER BREXIT

The current transitional measures in place as the UK leaves the EU will apply to at least until 31st December 2020, meaning MRLs for the UK will remain those of the EU during this time. A further period beyond December 2020 to extend these arrangements might be agreed, but it is feasible that from 2021 MRLs in the UK (excluding Ireland) may begin to differ to those in the EU. The UK is gearing up to be able to evaluate and set MRLs of their own. CGA has a watching brief on these



developments and is engaging with both the UK and EU regulators.

EU Organic Certificate of Inspection (COI) changes

Regulation (EU) 2020/25 published in January 2020 has made changes to the rules for issuing COIs for organic products entering the EU. From 3rd February 2020 COIs are to be issued BEFORE the product leaves the exporting country. This immediately creates a problem because COIs are issued on the basis of information that is only available AFTER shipping (typically the mate's receipt details). This "stalemate" scenario is being addressed by organic certification companies within the EU by seeking regulatory changes and updates to the TRACES System. In the meantime, CGA has engaged with certification bodies and exporters and have drafted guidelines that can help ensure organic fruit is able to enter the EU properly documented. These guidelines should be discussed with your service providers and supply chain partners to ensure the smooth flow of organic product to the EU during 2020.

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