



## CONSUMER ASSURANCE UPDATE

### European Union

- Mancozeb MRL:** Growers will be aware of the decision by the EU to withdraw the authorization of Dithiocarbamates in the EU, and EU Member States are preparing the withdrawal of products in each of their countries. Also, since December 2020 a process of evaluating the suitability of existing Dithiocarbamate MRLs has been initiated. This is a complicated process given that various active substances (Mancozeb, Maneb, Metiram, and Ziram) share a single residue definition (CS<sub>2</sub>). It remains unclear exactly when the CS<sub>2</sub> evaluation is likely to be concluded but Mancozeb MRLs are unlikely to be changed before the end of 2022. Meanwhile residue breakdown data for Mancozeb are being generated by key Mancozeb suppliers in South Africa in order to apply for an Import Tolerance, with the view to maintain the MRL beyond 2022. The data package should be completed by August 2022. However, during engagement with the Commission in early April it was indicated the dithiocarbamates were under significant attention by regulators and the EU parliament, and Import Tolerance applications do not automatically guarantee the setting of an MRL.
- Benomyl/Carbendazim:** The EU recently withdrew the authorization for Thiophanate-methyl across the EU. Since Thiophanate-methyl and Benomyl share a common residue definition, (i.e. Carbendazim) the EU Carbendazim MRL is currently under review. The European Food Safety Authority (EFSA) has been asked to provide an opinion on the consumer risks associated with the current residue tolerances. The opinion is expected to be released in the second half of 2021. This EFSA opinion will determine the process the Commission is likely to follow on the future status of the Carbendazim MRL.
- Abamectin (Avermectin):** The WTO Notification (G/TBT/N/EU/784) indicates the EU is proposing to amend its Abamectin authorization. From 1<sup>st</sup> July 2021 Member States will have six months to withdraw products other than for those products used in greenhouses. A further provision of a 12-month grace period is anticipated to allow treated product to be sold. Then, a separate process will review the MRLs – although the citrus MRLs are unlikely to change given the existing low tolerance of 0.01 mg/kg (i.e. effectively LOD).
- Cadmium MRL set:** The WTO Notification (G/TBT/N/EU/466) summarizes the EU's proposal to set tolerances for cadmium on specific crops. The tolerance proposed for citrus fruit is 0.02 mg/kg wet weight. The estimated date of publication in the Official Journal is June 2021 and the regulation will come into force 20 days after such publication. Based on historic data this new level is unlikely to lead to problems.
- Official EU residue monitoring programme:** The EU have released the official residue monitoring plan for 2022 to 2024 (Regulation 601/2021). This document follows the version applicable for 2019 to 2021, and instructs the food safety officials in each of the member states on what food products to focus on and which specific active substances they should be monitoring on those food products. Member States are compelled to provide the Commission with regular updates of their findings. The plan indicates oranges will be monitored closely in 2023 while grapefruit appears on the 2024 list. A significant proportion of the crop protection products registered on citrus in SA are included in the scope of active substances to be monitored. The implication here is that growers must continue to apply the appropriate recommended usage restrictions and help maintain the excellent performance of the SA citrus industry in meeting the EU MRL requirements.
- Imidacloprid – MRL Status:** As producers start planning for the 2022 season an update on Imidacloprid here seeks to provide decision-makers with the most up-to-date information. The EU recently notified via the WTO of proposed new MRLs for Imidacloprid on some products. Fortunately, the MRLs for citrus remain at 0.9 mg/kg. The indicated reason for proposed MRL changes for other crops relates to the withdrawal of the authorization of Imidacloprid use in the EU (under Regulation 1107/2009) and there being no EU uses or import product requiring that the MRLs be maintained. In previous Cutting Edge's CGA has indicated the Imidacloprid MRLs for citrus



will be reviewed and potentially changed, but not before mid-2022. This seems to have been postponed due to operational and administrative reasons, and it is currently not expected to occur before later in 2022. Some uncertainty here makes it difficult to predict if Imidacloprid use in the next production cycle will lead to any problems when fruit arrives in the market after mid-2022.

Separately, CGA recently engaged the Commission to see if any additional information could be shared with the industry. Unfortunately, the news was not positive in that the Commission is currently intending to draft regulations that would see some Neonicotinoid Import Tolerances being unilaterally withdrawn. The justification here is that the Commission is implementing the policy laid down by parliament in the Farm-2-Fork strategy, aimed at reducing the impact of the EU food system on the global environment. While this proposal is not aimed at Imidacloprid it does send a strong message about the intention of the Commission for this group of active substances. It is clear that without defending the Imidacloprid Import Tolerance the future use of Imidacloprid will be forfeited. Thus the CGA Board have instructed CGA to move ahead to generate data that would at least be considered by the EU. The justification for this decision is the important role Imidacloprid plays in current IPM strategies and its future importance to control ACP and HLB spread.

CGA has also noted the concern raised by some parties that residues of Imidacloprid are being detected at least one season after the active has been used in the orchard. CGA will therefore raise this with the Commission to ensure that if the MRL is lowered, the risk of an MRL exceedance due to historic applications is not problematic.

- **Organic Production under Farm-2-Fork Strategy**

Reforms on organic production come into force on 1<sup>st</sup> January 2022 in the EU. The main focus has been updating the list of substances permitted for use in organic production. It is still unclear how the new rules will affect countries producing organic food outside the EU, and the rules for products used for cleaning and disinfection. Affected countries have until the

28<sup>th</sup> May 2021 to make comments on these draft policies. Also, to track their efforts to promote organic production, stricter rules will apply when shipping to the EU. Organic growers need to note these developments in case they affect their traditional access points to the EU. Finally, how organic bodies are formally recognized for approving organic production sites in third-world countries is also under consideration.

- **South Korea:**

- **Mancozeb:** For the 2022 export season, CGA/CRI will be making changes to the Recommended Usage Restrictions document based on new MRLs that will apply for Dithiocarbamates in South Korea. The MRLs are revised as follows:

- Mandarins (Soft Citrus) = 5.0 mg/kg
- Lemons = 3.0 mg/kg
- Oranges = 2.0 mg/kg - temporary until the 31<sup>st</sup> December 2021. From 1<sup>st</sup> January 2022 LOD applies.
- Grapefruit = 5.0 mg/kg - temporary until the 31<sup>st</sup> December 2021. From 1<sup>st</sup> January 2022 LOD applies.

These amendments effectively mean usage of Mancozeb on oranges and grapefruit for 2022 will be problematic. The *Recommended Usage Restrictions* will remain as they are for 2021 but CGA/CRI will make changes later in the year for 2022.

- **Benomyl/Carbendazim:** CGA continues to engage with the South Korean authorities about establishing an Import Tolerance for Benomyl on citrus. The nature of the exchanges at present relates to the suitability of the data CGA have in hand to be able to set a tolerance for all citrus or only specific citrus types. At present soft citrus and lemons appear to have a better prospect of an MRL being set while oranges and grapefruit are in doubt.

- **Middle East Labelling Requirements**

Various members of the Gulf State Organizations (GSO) – Saudi Arabia, Qatar, Kuwait, Oman, Bahrain, and UAE – were jointly notified via the WTO of new Standards for product labels with respect to the use of terms such as “Fresh”, “Natural” and “Pure”, etc. CGA attempted to obtain, via various channels, details about what these new Standards mean and what sort of impact they



would have on trade, but with no success. Therefore as a precaution, exporters are simply advised to engage with their receivers to enquire whether there have been any practical labelling changes that might apply to SA citrus shipments sent to the Middle East for this season.

### **Citrus Sustainability Forum (CSF) – Citrus Sustainability Survey**

In terms of implementing the **CGA Food Safety and Sustainability Strategic Plan**, it is critical to capture the reality of the challenges faced by citrus growers, packhouses and exporters. For this purpose a Citrus Sustainability Survey has been set up online for stakeholders to complete. Growers, packhouse managers and exporters are strongly encouraged to make use of the questionnaire. These data will form a baseline to track issues over time and develop the background information needed to effectively engage with importers, retailers and regulators. The information will be treated confidentially and aggregated to prevent any commercial fallout. The online Citrus Sustainability Survey can be found here: <https://survey.zohopublic.com/zs/xCCNNU>  
Reponses are requested before the **10<sup>th</sup> May 2021**.

### **Indonesia**

Since 2014, South Africa has accessed the Indonesian market on the basis of having obtained the appropriate recognition status for the South African Food Control System. Such recognition is associated with operational risk-mitigation obligations undertaken in SA before the fruit is shipped. Unfortunately, this recognition status lapsed earlier this year and access to the Indonesian market for export citrus was effectively prohibited. DALRRD applied to retain the recognition status with Indonesia well before it expired. CGA understands that an official decree has been promulgated this week and South Africa's recognition status reinstated. CGA would like to thank DALRRD for securing this recognition status.

### **GLOBALG.A.P. Developments**

At the GLOBALG.A.P. National Technical Working Group (NTWG) meeting held on 15<sup>th</sup> April 2021 participants were updated on GLOBALG.A.P. developments. The main points were:

- Version 6 of the GLOBALG.A.P. standard is being finalized at present. It is in the third round

of public consultations. Version 6 is also being trialled at present, but will only become compulsory from April 2023.

- Disposal of tank mixes: It was noted that an evaporation area is not necessarily a requirement at tank mixing areas but proper risk assessments and management of the risk will continue to be required. This will be addressed in the National Interpretation guide.
- New GLOBALG.A.P. labels will be unveiled on the 27<sup>th</sup> April 2021 – as an optional logo if producers want to add this detail on their packaging.
- The Aldi-Albert Hein Grow add-on is applicable but still going through some refinement.

### **Confronting Climate Change – Carbon Calculator Workshops**

The CCC team are holding a series of workshops for those interested in calculating their carbon footprint. The Light Carbon Workshop is free of charge and will be held 18<sup>th</sup> May, 8<sup>th</sup> June, 29<sup>th</sup> June, 20<sup>th</sup> July and 10<sup>th</sup> August. Full Carbon Workshops are also planned for 11<sup>th</sup> May and 17<sup>th</sup> August. For more details please see the website: [here](#) or email: [support@bluenorth.co.za](mailto:support@bluenorth.co.za)

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29<sup>th</sup> April 2021