



CONSUMER ASSURANCE UPDATE

Update on Dithiocarbamate (Mancozeb) MRLs in the EU

CGA was again in direct communication with the EU Commission last week to obtain the latest information regarding developments around probable changes to the EU Dithiocarbamate MRLs. The feedback can be summarized as follows:

- The broader process of reviewing the EU Dithiocarbamate MRLs is still taking place, but at a slower rate than previously communicated by the EU.
- Currently the Member States and the Commission are “digesting” the Reasoned Opinion published by the European Food Safety Authority (EFSA) at the end of March 2023.
- Once they have worked through the Reasoned Opinion the Commission will begin working on a proposal for new MRLs to present to the Standing Committee on Pesticide Residues.
- In earlier engagement with the Commission, it seemed that the MRL proposal would have taken place in September this year, but it is clear that this will be pushed out to a much later stage, most likely to February 2024.
- The proposal will be voted on by the Member States for adoption which will trigger the process to change the relevant regulation (396/2005/EC). Once started, such a process usually takes about nine months before new MRLs come into force.
- While there are no guarantees that the law-making process would take the full nine months, the lack of urgency to change the current MRLs suggests that the normal nine-month timeline will apply. In other words, the existing EU Dithiocarbamate MRLs for citrus are likely to remain beyond mid-2024 as previously communicated (including the Mancozeb MRL), and only change closer to November 2024.

EU Benomyl/Carbendazim MRL

It was previously communicated that that EU has published draft Carbendazim MRLs for comment which show LOQ (0.01 mg/kg) MRLs for all citrus types. These draft MRLs are being discussed with the most likely prospect that they will be adopted as new MRLs. However, surprisingly the Commission requested data from CGA that would support the retention of some citrus MRLs. These

data were provided to the Commission, but it is unclear what the prospects of success are to defend the Carbendazim MRLs. Currently, the EU residue definition includes both Carbendazim and Benomyl (sum of Benomyl and Carbendazim expressed as Carbendazim), as Benomyl breaks down into Carbendazim. The intention is to separate the residue definition for Benomyl from Carbendazim and to allocate an MRL of 0.01 mg/kg to Benomyl as well.

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