



CONSUMER ASSURANCE UPDATE MARCH 2024

Paul Hardman and Paula Bester
Citrus Growers Association (CGA)

The CGA has been closely tracking the review process of the carbendazim/benomyl and mancozeb MRLs in the EU and communicated the updates at the Citrus Sustainability Forum and in various Consumer Assurance Cutting Edges.¹

The CGA recently went to see the EU Commission in person in Brussels to get the latest update of where they are in the review process of these actives and to again highlight the CGA/CRI's intention to submit a mancozeb Import Tolerance aiming to retain positive mancozeb MRLs for citrus in the EU.

EU Carbendazim/Benomyl MRLs

The Commission indicated that voting on new carbendazim MRLs is likely to take place before April 2024 (as a reminder, benomyl rapidly breaks down to carbendazim; the use of both benomyl and carbendazim are taken into account in the carbendazim MRL). If the proposed carbendazim MRLs are adopted, the administrative process will start which typically takes 5 months after which point the regulation will enter into force (September 2024). Oranges and grapefruit in the EU market by September 2024 would then need to comply with the new carbendazim MRL of 0.01 ppm. For mandarins and lemons, the current expectation is that the Commission will propose MRLs for voting in April. This will trigger the same administrative process, but a grace period of 6 months will most likely apply to these citrus types. This will mean that the new carbendazim MRLs will likely only apply to lemons and mandarins by March 2025. Separate to this process in the EU, both carbendazim and benomyl are likely to be phased out for use in South Africa by 1 June 2024.

EU Mancozeb (Dithiocarbamate) MRLs

The dithiocarbamates were discussed at a recent SCoPAFF meeting (1-2 February 2024). There were no decisions taken on the MRLs (including the mancozeb MRLs), the discussion was more centred around the residue definition which for now will stay as dithiocarbamates measured as total CS₂.

It seems apparent that voting on dithiocarbamate MRLs by SCoPAFF will only likely take place in

September 2024. It will then enter the MRL setting procedure which includes the adoption of proposed MRLs by the EU Parliament. The outcome of this voting process is uncertain, as it is subject to EU Parliament changes (a new EU Parliament will be elected this year and be functioning by June/July 2024).

Should the new dithiocarbamate MRLs be adopted in September, and the 9-month regulatory process followed before the new MRLs will apply, then new mancozeb MRLs are likely to apply in the EU by June 2025.

Separate to the MRL review process in the EU, the CGA is aware that the mancozeb registration holders are intending to defend the continued use of mancozeb in South Africa under Act 36 of 1947.

1= Consumer Assurance Cutting Edge No. 367, 381 and 384

The Use of Glufosinate Ammonium

In 2023 a detection of the herbicide glufosinate ammonium on exported citrus from South Africa was recorded. It is not unlawful to use herbicides registered under The Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act 36 of 1947 according to the label instructions, which include the prevention of spray drift onto edible crops when applying the product on weeds. However, this residue detection is unusual and signals that growers need to be particularly careful to follow label instructions. CGA was notified that some retailers are aware of the detection in 2023 and may institute intensified sampling for glufosinate ammonium residues during the 2024 export season.