



If accepted, South African organic and non-chem oranges will become completely unavailable in EU

Mandatory citrus cold treatment would be disastrous and ill-considered, says CGA



The Citrus Growers' Association sent out a letter to all South African citrus producers and their exporters yesterday on the eve of voting by the EU's SCOPAFF committee on the technical wording of proposed mandatory cold treatment for third country citrus imports.

Today's vote is only one step in the process as the technical wording still needs to go to the World Trade Organisation's SPS Committee for consideration where, the South African industry hopes, the Committee will agree with their view that the proposed measure is trade-restrictive and therefore runs counter to WTO principles.

South African citrus producers and exporters are anxiously awaiting the outcome of today's vote. "It is unavoidable that change is going to come to our citrus trade with the EU, whether today or in future," one exporter notes, adding that while oranges are the focus of this proposal, lemons are not a host for FCM.

"That is not yet a final vote. Third countries will then have sixty days to submit their views. Following this consultation, the EU can decide to amend the text or leave it unchanged. The final bill will then be put to the vote. to the 27 member states", explains Inge Ribbens on behalf

of the GroentenFruit Huis, the Dutch organisation working on behalf of the fruit and vegetable trade.

"We have been working intensively on this dossier for months, also in view of the high pressure that has recently been exerted on the Commission, in particular by the Southern Member States, to introduce the cold treatment. A letter has been drawn up together with the sector organizations from Belgium and Germany sent to the Technical Committee in Brussels and supported by the NL retail (CBL) also to various departments within the European Commission. We hope that several Member States will voice their concerns. We believe that the EU is working with third countries at a much earlier stage should have spoken and that only happened at a very late moment, so that they did not have the opportunity to give a substantive response," said Ribbens.

"In addition, we lack the scientific basis. The number of finds from the False Codling Moth is not showing an upward trend, in fact, the number of finds in oranges is decreasing. Since FCM was declared an EU quarantine plague three years ago, there have been 15, 12 and 8 interceptions on South African oranges respectively in 2019, 2020 and 2021. This makes this measure disproportionate, especially if you look at other product groups where a significantly lower trade volume involves more finds," says Ribbens.

CGA letter to EU SCOPAFF representatives (abbreviated)

The EU SCOPAFF, Plant Health Section, is due to endorse a draft amendment of Implementing Regulation (EU) 2019/2072 regarding the import requirements of *Thaumatotibia leucotreta* (false codling moth, or FCM) on citrus from third countries, amongst other South Africa on 8th Feb.

This draft amendment to this Regulation includes a mandatory requirement that all oranges from third countries in Africa and Israel be subjected to cold treatment for minimum 16 days at a temperature between 0 and -1 degrees C.

This new requirement will have a deleterious impact on the more than 100 year old citrus trade between Europe and South Africa (the most important source of citrus for the EU during the European summer, with a value of over EUR 1 billion).

In particular, it will prevent the import of all organic and non-chemically treated oranges, as well as several important cultivars that do not tolerate this temperature. This will cause important gaps in the availability of excellent quality oranges to EU consumers through the European summer, which has relied on this supply over the past decades.

This proposed new requirement is not justified on plant health grounds:

Cold treatment is already part of the South African Risk Management System for FCM. But different cold treatment (time-temperature) components are applied based on the objective risk assessment in the systems approach that results from diligent and comprehensive weekly monitoring of any FCM presence during pre-harvest citrus orchards in South Africa.

Introducing a blanket, one-size-fits-all cold treatment requirement invalidates the benefits achieved pre-harvest on minimal chemical intervention and the whole idea of a systems approach.

FCM risk has not increased

The FCM risk from South Africa to the EU has not increased since FCM was declared an EU quarantine pest 3 years ago. The record over the past three years has been 14, 19 and 15 interceptions (NONCs). This is not an upward trend.

More FCM interceptions on cut flowers and other horticultural products

The risk is not particularly high from oranges. Based on the EU's own data, oranges accounted for 15, 12 and 8 of the above NONCs over the past three years [2019 to 2021] ie, clearly in decline.

Proposed amendment contrary to WTO principles

Other available time-temperature protocols, enshrined in the EU FCM risk management system and in the draft recognised IPPC ISMP standards have proven similar efficacy as the protocol that the EU intends to impose [the evidence of these efficacies were jointly published in CRI scientific literature during 2016, subjected to peer-review and is currently recognised as the world authority position on cold treatment for FCM – and the basis for the IPPC's ISMP draft on FCM].

As a minimum, the least trade restrictive temperature cold protocols should be available, if mandatory cold treatment is at all required, not the current mooted regime.

South Africa has successfully traded citrus fruit with the EU for over 100 years. South African growers are extremely well aware of the importance of protecting production from pests and fully recognise the right of European growers to be afforded such protection.

South African growers spend an estimated ZAR 3.4 billion annually to ensure the highest levels of compliance with EU plant health regulations on FCM and CBS. This major investment is what enables the operation of probably the most sophisticated world risk management systems on plant health [in the words of EU officials]. It thus makes no sense to undermine it all with an unnecessary and disproportionate one-size-fits-all mandatory cold treatment requirement, which nullifies the progressive, environmentally friendly and sustainable RMS on FCM which South Africa manages and maintains.

"We respectfully urge you to oppose this draft amendment of Implementing Regulation (EU) 2019/2072 and call on you to ask the European Commission to commission more proportionate, effective and, above all, readily available alternatives, following further consultation with South Africa." Deon Joubert, SPECIAL CGA ENVOY: MARKET ACCESS & EU MATTERS

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