IMAZALIL EU MRL CHANGES

The Low-Down

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During a visit by the Citrus Growers' Association (CGA) to the EU in September 2018, the southern African citrus industry became aware of a possible reduction to the imazalil maximum residue level (MRL) applicable for the EU market.

This triggered a series of actions by the CGA, Citrus Research International (CRI) and others. Due to these inputs the proposed new MRLs are unlikely to have a major impact on the southern African citrus industry. This favourable outcome was hard fought, and below follows a description of some of these actions that should shed light on the extent of the CGA and CRI's representation of growers.

Background to MRL changes

Although it was known that the imazalil MRLs were being reviewed (which had been initiated by an application to increase the MRLs), concern arose once the European Food Safety Authority (EFSA) made recommendations to lower the MRL to level of detection (LOD) 0.01 mg/kg in October 2018. The basis for EFSA's recommendation was an apparent lack of information about one of the metabolites (breakdown products) of imazalil when used in postharvest applications.

Once it became clear that the European Commission was then intending to follow EFSA's recommendation, and the reality of having to supply citrus to the EU market free of any imazalil residues was apparent, the CGA and CRI began working on a way forward that would prevent loss of value and trade within this important market.

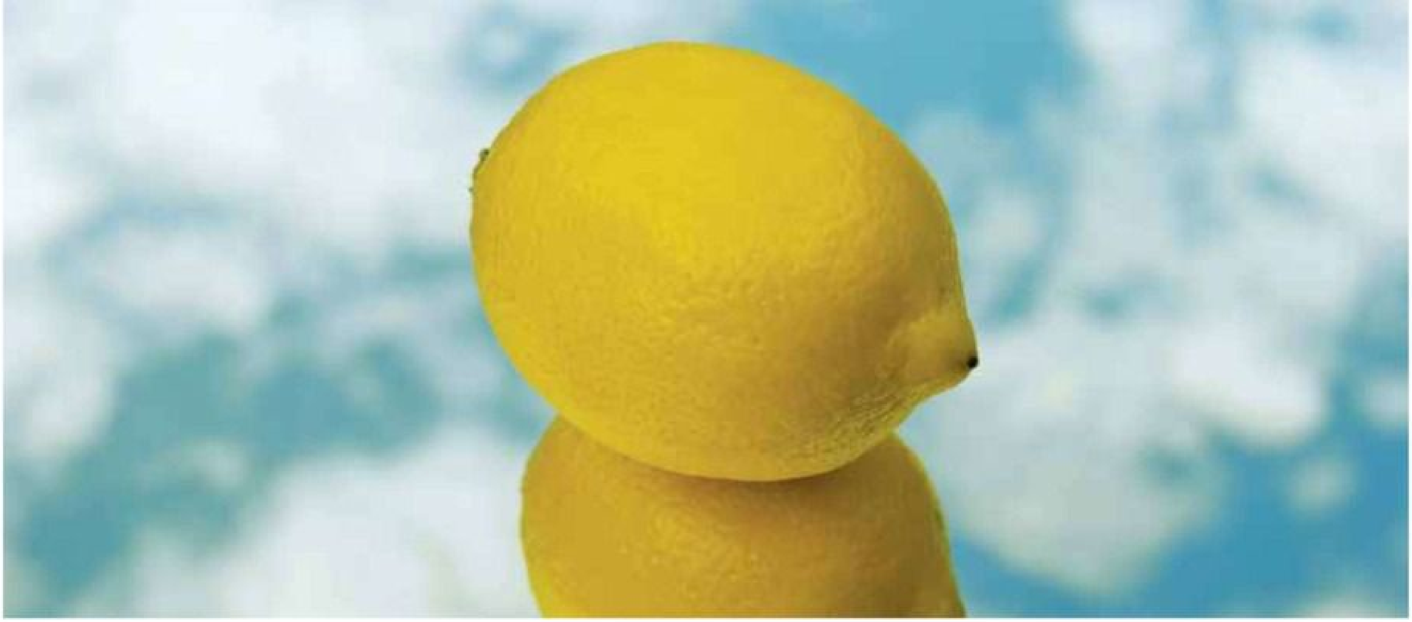
Snapshot: the CGA and CRI's efforts to find a workable solution

1 In December 2018, the CGA (Paul Hardman) spoke directly to the European Commission (DG SANTE) to get an understanding of the technical details, internal discussions and likely direction of the EC Standing Committee on Pesticide Residues on this matter. Previous visits by the CGA to DG SANTE ensured the appropriate contact was achieved. The Commission's proposition to reduce the imazalil MRLs to limit of detection (LOD) for all citrus types, and the fact that the Standing Committee would be considering this proposal at the February 2019 meeting were confirmed. It seemed the majority of Member States would be voting in favour of the proposal and the legal process of reducing the MRL would be initiated immediately thereafter. The Commission predicted that the new lower MRLs would come into effect by February 2020. The CGA was then able to express its concerns to the Commission about what effect these changes would have on a range of issues, including the negative impact on trade, the impact on fungicide resistance management, and the increase in food waste.

2 The CGA immediately engaged the main suppliers of imazalil to the SA citrus market, and also the firm that has sponsored the data for setting EU MRLs previously – Janssen Pharmaceuticals. Janssen acknowledged the situation was dire, and confirmed that they would be seeking to fill any data gaps so that EFSA could conclude the risk assessments. Importantly, this engagement with imazalil suppliers ensured there was an understanding of the technicalities of the problem. It was also hoped that there would be an alignment on possible solutions between key role-players.

3 Deon Joubert and Paul Hardman from the CGA began engagements with Member States to establish their views on this issue and to express concerns about the impact on trade due to the changes in the MRLs. In particular, this engagement was seeking to alert the Member States to the wider implication, since the Commission tends to work in silos. For example, issues of food waste or trade are not otherwise brought to the attention of those doing work on MRLs.

4 The CGA and CRI formed an ad hoc imazalil workgroup that would then meet at regular intervals to track the progress of the MRL changes, but also to consider a future without imazalil as a postharvest treatment option for the EU. These discussions were particularly relevant in light



of the upcoming CRI packhouse workshops that were due to take place in January/February 2019. In fact, one of the main outputs from the workgroup was a specific presentation at the CRI packhouse workshops on the topic. Here, significant contributions were made by the CRI postharvest team of Jan Van Niekerk, Wilma Du Plooy and CRI CEO Vaughan Hatting, as well as Werner Van Rooyen from FPEF. Their work influenced the communication to stakeholders in the EU, including interested retailers and fresh produce businesses.

5 In February 2019, CRI started planning a series of trials to (re-) consider the effectiveness of alternative postharvest treatment controls. It's worth mentioning that, in light of the constant pressure from retailers to reduce residues on fruit, CRI has over years conducted many studies to evaluate alternatives. In summary, this history of work has shown that imazalil is an effective postharvest treatment relative to any of the available alternatives. The additional new trials would, therefore be focussing on how to use the alternatives without imazalil being central to those plans, and to consider fungicide resistance strategies in the absence of imazalil. It's become clear that overall control of postharvest decay without imazalil is considerably hampered, with many associated practical implications for packhouses across southern Africa.

6 During visits to the EU Deon Joubert from the CGA engaged further with Member States and the Commission, to dissuade them from being overly cautious, to the detriment of trade. Bear in mind, that imazalil (as a whole, including all metabolites) had not been found to cause undue risk to consumers. With these efforts and the growing concerns within the EU, the Commission decided to delay their proposal on imazalil until after the Standing Committee meeting in February 2019. The implication was that new MRLs would then come into effect later, but at that stage the understanding was that the proposal remained the same, and new MRLs would be at LOD.

7 Through February and March, further lobbying and discussion between the Commission and an alliance of stakeholders resulted in the Commission changing their proposal specifically for the citrus MRLs, with the MRL reduction for oranges and grapefruit from 5.0 mg/kg to 4.0 mg/kg being an important material change. The other citrus MRLs were to remain the same at 5.0 mg/kg. It is well worth noting that the banana industry, which also uses imazalil, was not able to retain their existing MRLs in the Commission's proposal.

8 In April 2019 the Commission formally notified trading partners of their intention to change the imazalil MRLs via the WTO notification process, where it was confirmed that the MRLs for grapefruit and oranges were the only citrus MRL that would be amended. If there are no challenges to the notification within the 60-day comment period, the revised MRLs will be published in the Official Journal later in the year, with a 180-day "phase in" period expected thereafter. These revised citrus MRLs will be established and maintained, subject to the main data sponsor providing additional evidence around the toxicity of the specific metabolite in question, within an agreed period of time. Currently, Janssen is working relentlessly to fill in the missing data gaps.

Effective from 2020, unavoidable changes will apply for grapefruit and orange growers supplying the EU market. However, the net result is considerably better than the situation the southern African citrus industry was facing in December 2018.

While the CGA has played a part in this, the work done by the team at CRI, FPEF and Janssen Pharmaceuticals is acknowledged and greatly appreciated.