



# EU Pesticide Policy: Challenges and possible solutions

## Perspective of EU importers of nuts and dried fruit

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# I. ABOUT FRUCOM



- **Non-profit international association** established 1960
- **Officially recognized by EU Institutions**
- Is the **representative body of European traders in dried fruit & nuts**, processed fruit & vegetables & seafood
- Specialized in trade, **food safety**, sustainability, customs, nutrition (new) for our sectors
- Based in **Brussels**, the EU capital
- **Strong EU network**
- Members in main supplying countries

# US MEMBERS

 		Co-operation with:
      		

## II. ISSUES

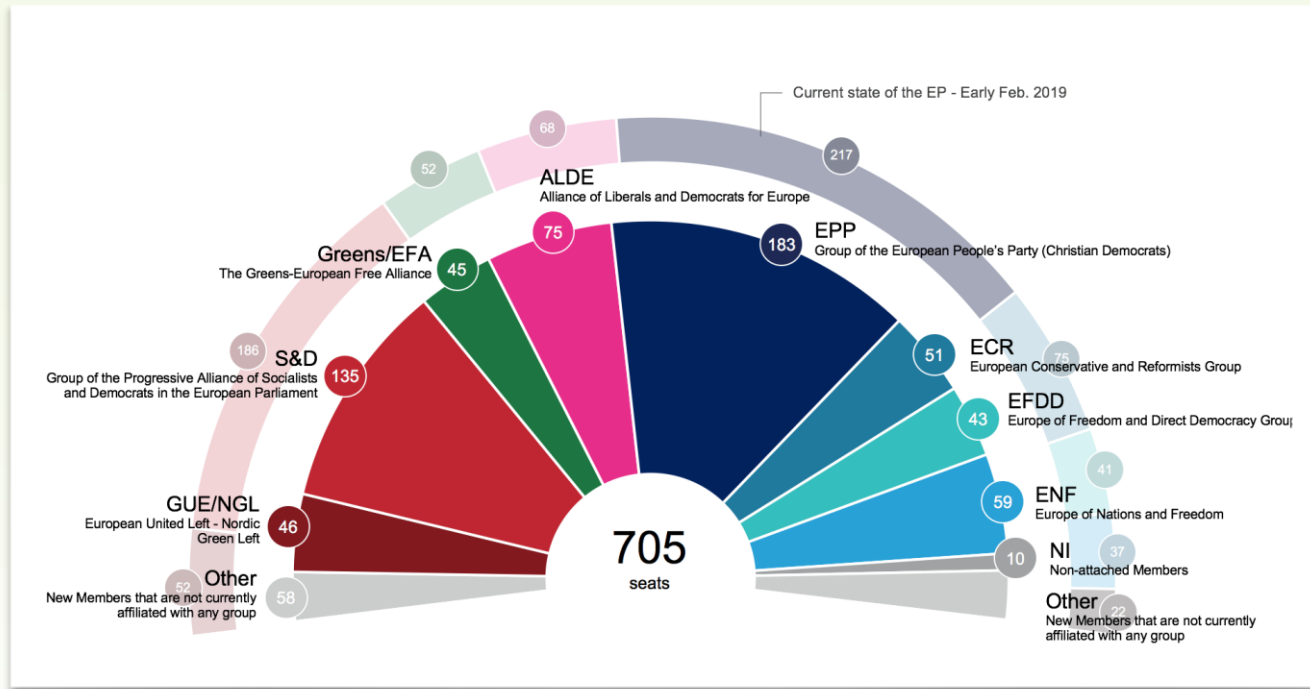
- EU **public opinion** and **political landscape**
- **EU legislation** and examples of application
- Recent&expected developments

**Assumption:** traders' perspective - legal certainty of selling products (with long shelf life), different from (re) authorization of active substance in the EU



Explain and Send Screenshots  
<https://frucom.eu/>

# New European Parliament (2019-2024)



- Additional Green members in the EU Parliament
- Environment committee: 76 Members - the largest committee
- A strong signal to step up fight against climate change
- Push for ambitious Green deal/ transitioning to greener economy.
- Other policy priorities: biodiversity, the circular economy, public health, food safety, air and water quality, the use of chemicals and pesticides



# New Commissioner for Health Stella Kyriakides

## Mission letter

1. Protecting and promoting public health
2. Work on food safety, animal welfare and plant health as part of delivering on European Green Deal

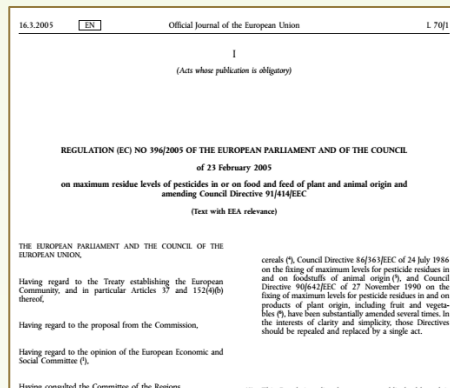
*“As part of delivering on our zero-pollution ambition and ‘Farm to Fork’ strategy, I want you to work on protecting plant health, reducing dependency on pesticides and stimulating the take-up of low-risk and non-chemical alternatives. You should help protect citizens from exposure to endocrine disruptors”*



# EU law on pesticides

## Regulation 396/2005

Covers MRLs  
Risk-based




## Regulation 1107/2009

Covers pesticides authorizations  
Hazard-based



## Database on EU MRLs



PLANTS

EU Pesticides database

European Commission > Food Safety > Plants > Pesticides > Pesticides Database

HEALTH FOOD ANIMALS **PLANTS**

PESTICIDES

EU Pesticides database

Search active substances

Search products

**Search pesticide residues**

Download MRLs data

Sustainable use of pesticides

Approval of active substances

Authorisation of Plant Protection Products

Maximum Residue levels

### Search pesticide residues

1 Select pesticide residues (5 max)

Search:

Pesticide residues
<input type="checkbox"/> 1,1-dichloro-2,2-bis(4-ethylphenyl)ethane (F)
<input type="checkbox"/> 1,2-dibromoethane (ethylene dibromide) (F)
<input type="checkbox"/> 1,2-dichloroethane (ethylene dichloride) (F)
<input type="checkbox"/> 1,3-Dichloropropene
<input type="checkbox"/> 1,4-Diaminobutane (aka Putrescine) (++)
<input type="checkbox"/> 1,4-Dimethylnaphthalene

2 Select products

Search:

Code	Groups and examples of individual products to which the MRLs apply (a)
<input checked="" type="checkbox"/> All	
<input type="checkbox"/> 0100000 FRUITS, FRESH OR FROZEN; TREE NUTS	
<input type="checkbox"/> 0110000 Citrus fruits	
<input type="checkbox"/> 0110010 Grapefruits	
<input type="checkbox"/> 0110020 Oranges	
<input type="checkbox"/> 0110030 Lemons	
<input type="checkbox"/> 0110040 Limes	

3 Select

☒ Current MRLs

☐ MRLs evolution (max 1 pesticide)

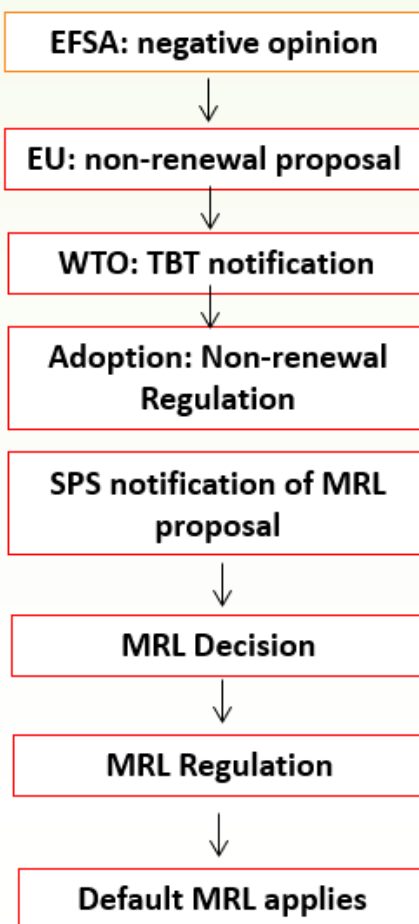
**4 Display**

Pesticides selected

Products selected

## Some reasons/sequence for reduction of EU MRLs

- substance not re-notified
- human health cut-off criteria triggered
- substances approved under derogations (negligible exposure or serious danger to plant health)
- substances not re-approved for reasons other than cut-off
- review of MRLs



### Cut-off criteria

Substances of high concern for human health

- Endocrine disruptors
- Carcinogens (cat 1A,1B)
- Mutagens (cat 1A,1B)
- Toxic for reproduction (cat 1A,1B).

Substances of high concern for the environment

- POP (persistent organic pollutant)
- PBT (persistent bioaccumulative and toxic)
- vPvB (very persistent and very bioaccumulative).



# Chlorate

- No longer approved as a pesticide
- EFSA: negative impact on iodine uptake especially among infants and children
- Chlorate originates from chlorine disinfectants widely and legally used in water treatment and food processing, drinking water being by far the main contributor.
- New MRLs from June/July 2020, will be reviewed within 5 years
- Footnote for processed products: *“The burden of proof regarding the level of those additional contributions lies with the food and feed business operator”*.



**EUROPEAN UNION – IMPLEMENTATION OF NON-TARIFF BARRIERS  
ON AGRICULTURAL PRODUCTS**

COMMUNICATION FROM AUSTRALIA, BRAZIL, CANADA, COLOMBIA, COSTA RICA, DOMINICAN  
REPUBLIC, ECUADOR, GUATEMALA, HONDURAS, MALAYSIA, NICARAGUA, PANAMA,  
PARAGUAY, PERU, UNITED STATES, AND URUGUAY

Most Members that use these substances **do not have** the capacity to develop viable and **economically feasible alternatives** to use in their production systems. Even if those alternatives were to be developed elsewhere, the process for registration and approval would take more time than the grace period established by the EU. In addition, **the EU has not even considered Members' requests for additional transition periods** in order to adapt to these regulations. The EU's implementation of these measures is already impacting global agricultural production and trade in key products such as bananas, grapes, cereals and tree nuts. **This disruption threatens to escalate significantly** in the coming years if the EU does not change its current approach.

## To gather data and scientific knowledge to

- be a reliable partner
- identify relevant MRL changes
- detect give members an easy-to-use tool



Interested in joining the project?

[info@frucom.eu](mailto:info@frucom.eu)