

ISSUES REVIEW

A Customized Report for the California Wine Industry

EU Pesticide and MRL Policies

The European Union is set for a significant transition in 2025 following its 2024 Parliament and Commission elections. The expected spring policy agenda of the new European Commission is likely to maintain a strong focus on agricultural sustainability and pesticide reduction. Increasing pressure from European farmers could influence trade dynamics, as their demands for fair treatment in agricultural trade may result in stricter technical barriers, including MRL restrictions, to create a level playing field between EU and foreign producers.

Potential Impact of EU Approval Restrictions

The expiration and non-renewal of EU pesticide approvals directly impact corresponding MRLs, with several wine grape MRLs already facing restrictions. BCI monitors these EU pesticide reviews to identify risks to US wine grape exports. Below, list active ingredients with approvals that have expired, been restricted, or non-renewed in the EU since January 2024:

- **Dimethomorph** (Forum)
- **Flubendiamide** (Belt)
- **Metaflumizone** (Altrevin)
- **Metalaxyl-M** (Orondis)
- **Spinetoram** (Delegate)
- **Spirotetramat** (Movento)

- **EU Pesticide and MRL Policies**
- **EU MRL for Cevya Established**
- **Korea Proposes Three New MRLs**
- **New USDA ASCE MRL Projects**

BCI continues to review international MRL changes around the world that might impact wine grapes. Since January 2024, BCI has reviewed nearly 700 notifications and has informed the Wine Institute of MRL changes in Australia, Brazil, Korea, Japan, the EU, Codex, Great Britain, Taiwan, Türkiye, South Africa, Mexico, Israel, China, Chile, India, Costa Rica, and Indonesia.

Specific EU Wine Grape MRL Updates

Currently, there are **166** EU MRLs established on wine grapes with corresponding US MRLs. Since January 2024, the European Union has established **seven** and proposed **six** wine grape MRLs:

Established:

- **Bifenazate** (Acramite): new EU MRL 0.01 ppm; US MRL 0.75 ppm.
- **Etoxazole** (Zeal/Stifle/Zara): new EU MRL 0.01 ppm; US MRL 0.5 ppm.
- **Indoxacarb** (Avaunt): new EU MRL 0.01 ppm; US MRL 2 ppm.
- **Mefentrifluconazole** (Cevya): new EU MRL 2 ppm; US MRL 1.5 ppm.
- **Metalaxyl** (Orondis/Ridomil): new EU MRL 1.5 ppm; US MRL 2 ppm.
- **Metalaxyl-M** (Orondis/Ridomil): new EU MRL 1.5 ppm; US MRL 2 ppm.
- **Pyriproxyfen** (Esteem/Knack): new EU MRL 0.01 ppm; US MRL 2.5 ppm.

Proposed:

- **Acetamiprid** (Anarchy/Arvida): proposed restriction from 0.5 ppm to 0.08 ppm; US MRL 0.35 ppm.
- **Difenoconazole** (Aprovia/Inspire): EFSA proposed to either maintain the MRL at 3 ppm or lower the MRL to the undefined limit of quantification (LOQ).
 - This two-part MRL proposal is due to a lack of data supporting the current 3 ppm MRL, but the current MRL of 3 ppm also does not present risks to consumers. Further evaluation is needed by EFSA.
- **Fludioxonil** (Alterity/Miravis Prime): proposed increase from 4 ppm to 5 ppm; US MRL 2 ppm.
- **Myclobutanil** (Eagle/Rally): proposed restriction from 1.5 ppm to 0.9 ppm; US MRL 1 ppm.
- **Pydiflumetofen** (Miravis Prime): proposed increase from 0.01 ppm to 2 ppm; US MRL 1.5 ppm.
- **Zeta-cypermethrin** (Mustang/Gladiator): proposed restriction from 0.5 ppm to 0.04 ppm; US MRL 2 ppm.

BCI will continue to monitor the EU pesticide and MRL review processes and inform the industry of new developments.

Great Britain

During multiple occasions in 2024, BCI had the opportunity to meet with Dr. Julian Cudmore, the UK's MRL technical lead, to discuss the MRL system and challenges in Great Britain. He highlighted that Great Britain has been establishing new MRLs primarily as a result of import tolerance requests; Codex MRL harmonization; or when human health concerns have been identified. MRL reviews will likely occur in parallel with or within three years of the approval process. Great Britain will adopt Codex MRLs into its own system if no concerns have been identified.

Currently, there are **168** Great Britain MRLs established on wine grapes with corresponding US MRLs. Since January 2024, Great Britain has established **one** wine grape MRL:

Established:

- **Pydiflumetofen** (Miravis Prime): new GB MRL 0.01 ppm; US MRL 1.5 ppm.

Application of analytical measurement of uncertainty: It is important to note that, similarly to the European Union, authorities in Great Britain may also choose to apply a 50% measurement of uncertainty to any result that contained a residue over the MRL during enforcement procedures.

Codex MRLs

Currently, there are **102** Codex MRLs established on wine grapes with corresponding US MRLs. In the last meeting of the Codex Committee on Pesticide Residues (CCPR), no MRLs relevant for the California wine grapes were established. The next CCPR meeting will take place in Chile from May 19-24, 2025. BCI's Alinne Oliveira attends CCPR as a member of the US delegation.

Korea

Currently, there are **121** Korean MRLs established on wine grapes with corresponding US MRLs. Since January 2024, Korea has established **one** and proposed **three** wine grape MRLs:

Established:

- **Acetamiprid** (Anarchy/Arvida): new Korean MRL 2 ppm; US MRL 0.35 ppm.

Proposed:

- **Flonicamid** (Beleaf 50): proposed increase from 0.7 ppm to 1.5 ppm; US MRL 3 ppm.
- **Pyrethrins** (Azera/Evergreen): proposed restriction from 1 ppm to 0.4 ppm; US MRL 1 ppm.
- **Pyriproxyfen** (Braize/Cusack): proposed increase from 0.01 ppm to 2.5 ppm; US MRL 2.5 ppm.

In July, Korea announced that it was proposing to make changes to its pesticide monitoring list on newly imported agricultural products. Korea proposed to add 18 new active ingredients to this mandatory testing list, which includes **eight** that are relevant to the wine grape industry: **ametoctradin** (Zampro), **fluopyram** (Broadform), **kresoxim-methyl** (Narvos), **mandestrobin** (Intuity), **myclobutanil** (Eagle), **pendimethalin** (Acumen), **propyzamide** (Kerb), and **tetraconazole** (Andiamo). Once added to this list, these active ingredients will be tested on all imported agricultural products into Korea. Importantly, the MRLs for these active ingredients are not changing, but as always, the MRLs must comply with the currently established MRL in Korea for each product/active ingredient combination.

BCI will continue to monitor Korean MRL updates and inform the industry of any changes.

China

China generally announces major MRL updates every one to two years as part of its review process. While China often aligns its national MRLs with Codex levels, **they do not defer to Codex standards.**

Currently, there are **108** Chinese MRLs established on wine grapes with corresponding US MRLs. Since January 2024, China has proposed **one** wine grape MRL:

Proposed:

- **Pydiflumetofen**: proposed new MRL of 1.5 ppm is harmonized with the US MRL.

Japan

Currently, there are **159** Japanese MRLs established on wine grapes with corresponding US MRLs. Since January 2024, Japan has established **five** and proposed **three** wine grape MRLs:

Established:

- **Flumioxazin** (Chateau/Broadstar): new Japan MRL 0.05 ppm; US MRL 0.02 ppm.
- **Iprodione** (Rovral): new Japan MRL 30 ppm; US MRL 60 ppm.
- **Metaflumizone** (Altrevin): new Japan MRL 5 ppm is harmonized with the US and Codex MRLs.

Pending (future effective date):

- **Cyflufenamid** (Fastback/Torino): current Japan MRL 0.5 ppm; pending Japan MRL 0.4 ppm (*effective March 4, 2025*); US MRL 0.15 ppm.
- **Paraquat dichloride** (Gramoxone): current Japan MRL 0.05 ppm; pending Japan MRL 0.01 ppm (*effective March 4, 2025*); US MRL 0.05 ppm.

Proposed:

- **Fluopyram** (Broadform): proposed MRL restriction from 5 ppm to 2 ppm; US MRL 2 ppm.
- **Mandestrobin** (Intuity): proposed increase from 10 ppm to 20 ppm; US MRL 5 ppm.
- **Spirotetramat** (Movento): proposed increase from 5 ppm to 8 ppm; US MRL 1.3 ppm.

USDA's ASCE Initiative

The USDA's Foreign Agricultural Service (FAS) launched the Assisting Specialty Crop Exports (ASCE) Initiative to enhance U.S. specialty crop exports by addressing non-tariff trade barriers. Consultations in 2023 and 2024 with various U.S. specialty crop groups and stakeholders highlighted several priority areas, leading to multiple funded projects. The first ASCE projects were funded in Summer 2024 and included four MRL related projects:

- **APEC Import MRL Project:** to address the trade barriers created through missing MRLs in key Asia Pacific Economic Community markets by establishing new import MRLs (iMRLs) and encouraging adoption of the APEC import MRL guidelines.
- **Data Generation for Codex:** to reduce the number of missing and misaligned MRLs by establishing new Codex MRLs that benefit U.S. specialty crops and promoting a risk-based approach to MRL setting.

USDA's ASCE Initiative (*continued*)

- **Regional MRL Policy Engagement:** to promote regional alignment of pesticide regulatory systems and trade facilitative MRLs in Asia, Africa, and Latin America. Each region has a dedicated workplan that addresses specific needs.
- **MRL Quick Reference Sheets (QRS):** to inform U.S. specialty crop exporters of established MRLs in key markets. MRL QRSs will be prepared for 60 specialty crops and updated twice per year.

A Stakeholder Group has been established to provide strategic advice and recommendations to teams implementing the ASCE MRL projects concerning priority markets and MRL issues for specialty crops within these markets. The California wine industry is represented by the Wine Institute. Bryant Christie Inc. is closely involved with all of these ASCE projects.

Disclaimer:

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