World Citrus Organisation

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Private Food Safety Criteria and their impact on the citrus sector

The World Citrus Organization (WCO) represents the global citrus community, primarily the citrus producers, who are committed to providing safe and nutritious food to consumers. The WCO is gravely concerned about the retailers' private food safety criteria. The WCO foresees that these requirements will be highly problematic in the long run, directly contravening scientific evidence and jeopardising the sustainability of the world's citrus industry. This position paper aims to highlight the challenges citrus growers are facing and to summarise the repercussions of the retailer requirements that are beyond the legal obligations.

1. Banning the use of certain active substances

Plant pests and diseases differ between countries. Registered plant protection products will inevitably differ across the globe. It is unrealistic for retailers to decide which active substances are no longer authorised to be used in countries. **All products registered for use on citrus in the respective countries may be legally used. When exporting, citrus fruit must comply with the legal MRLs in the country of destination.**

Repercussions if active substances that are allowed to be used by growers are banned by retailers:

- Certain active substances on retailer blacklists are registered to control phytosanitary pests and diseases. Banning the use of these active substances, even though the use will result in compliance with the legal MRLs on citrus, jeopardises the ability of the citrus industry to ensure sustained supply in compliance with the strict phytosanitary import regulations.

2. Not accepting the legally established MRLs

It is alarming that some retailers impose restrictions based on a proportion of the legal MRLs. **This approach is not scientifically justifiable.** Growers attempting to meet these lower residue levels, may have repercussions on farm level, including:

- Pest and disease resistance build-up: a global catastrophe
    - **Under-dosing plant protection products will inevitably lead to resistance build-up of pests and diseases over time**. The adapted strains or individuals are then no longer effectively controlled by the registered products. Similar to the situation regarding medicinal antibiotics, effective plant protection solutions are not readily forthcoming - therefore we need to protect the efficacy active substances we have at hand and use them according to the registered dosages.

- Higher food waste due to post-harvest decay
    - If post-harvest diseases are not fully controlled, the shelf life of fruit is compromised, leading to unnecessary food waste which is directly against sustainability goals and targets. **Traded citrus will inevitably be subject to transit time and disrupted logistics**

may cause unexpected long travel time. If the fruit is not adequately protected with post-harvest active substances, it will result in more spoilage, food waste and financial loss for the grower.

3. Limiting the number of residues on fruit

There is no incentive for producers to excessively or unnecessarily apply plant protection products, as this practice will negatively impact their revenue. Consumer risk assessments and MRL proposals take multiple or combined residue exposure into account – a method that is continuously being improved.

The repercussions if growers are limited to a certain number of residues on citrus:

- Growers cannot implement Integrated Pest Management (IPM)
    - **Globally, newer registered plant protection products are much more target-specific and less detrimental to non-target and beneficial insects, however, these substances often leave a residue on fruit.** A true IPM approach would mean that growers monitor and measure the pest or disease pressure in their orchards throughout the season and only chemically intervene if necessary with the option that is least detrimental to beneficial insects. This might entail applying a plant protection product late in a season, which will likely leave a residue on the harvested fruit complying with MRL regulation.
- Growers make compromises
    - **Packhouses may want to use a combination of post-harvest active substances – each one with a different mode of action** to:
        - provide protective and curative action against moulds,
        - to keep the calyx (or green button) intact, and
        - to protect the rind from chilling injury during cold transit

      If packhouses want to apply a combination of post-harvest chemistry on fruit, this often leaves growers with one to zero pre-harvest residue options. The reality is, that phytosanitary pests and diseases need to be controlled to maintain market access and trade. Growers are now forced to make compromises on their post-harvest treatments because they have to effectively control pre-harvest phytosanitary pests or diseases. This in turn will lead to fruit quality compromise and tremendous food waste or resistance build-up of fungi if the same fungicides are used pre- and postharvest to limit the number of residues on the fruit.

- Growers lose resilience against climate change
    - **Growers across the globe are faced with climate change and unpredictable weather patterns. Peculiar pests and diseases may develop during a production cycle which then have to be controlled – albeit just before harvest**. The number of actives on the fruit at harvest can't be predicted or pre-decided, this is an unrealistic expectation.
    - In an attempt to mitigate climate change, many exporting citrus growers have erected netting over their orchards to protect trees and fruit from strong winds, hail damage, etc. These nets create micro-climates and lead to favourable conditions for certain

pests to flourish. In some cases, certain pre-harvest plant protection products will be required to control certain pests under netting.

The reality

Although retailer food safety standards are not legally binding, they force growers to aim for these requirements when they want to supply to these retailers. Unfortunately, these rules are very constraining and negatively impact best farming practices. In the long run, this may lead to growers no longer being able to deliver to certain retailers in light of changing pests and diseases, phytosanitary rules, and climate change. Citrus is a perishable product that needs to be protected from pests and diseases pre-harvest, as well as shelf-life decay post-harvest. **Food safety should not become a competitive tool used by retailers to gain short-term consumer trust.** This approach automatically creates distrust in the science and competent authorities who set the legal MRLs in/on food. In turn, the retailers automatically start undermining the role of government authorities.

Final remarks

The WCO urges retailers in general to not create their own food safety rules that are beyond the legal requirements and to take the long-term repercussions into account. In the long run, this might result in supply shortages to retailer shelves.