

Embassy of India

Belgium, Luxembourg & the European Union

Pesticide Monitoring

Newsletter March- April 2025

For each active substance, the relevant export promotion bodies have been mentioned for their action on analysing the implications of the new MRL's and desimination of these MRL's to relevant stakeholders such as farmers, traders, exporters, private companies etc.

A. EU updates on Pesticides

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I. Change in MRL of Active Substances

Maximum Residue Limits (MRLs) refer to the highest levels of pesticide residues legally allowed in or on food and feed products, based on what is considered safe for human consumption. Changes in MRLs can happen for various reasons, and these adjustments can impact agricultural practices, food imports and exports. The changes in MRLs for active substances follow a structured regulatory review process, led by the European Food Safety Authority (EFSA).

Cycloxydim¹ is an herbicide primarily used on grass fields to control grass weeds. However, it is also used on crops like sugar beet, several vegetables and fruits. An agricultural company based in the Netherlands has filed with relevant documentation a request to EFSA to modify the residue level (MRL) of Cycloxydim. EFSA's² review has found that for some uses on agricultural products there is a certain risk of a carry-over

effect, meaning that EFSA suspects additional risk in increasing the MRL. This is because certain products could later be used again on crops or livestock, causing difficult to calculate effects on these products. Therefore for those products that could cause such a carry over effect MRL's will remain unchanged. However for the other products without this effect EFSA has concluded that there are no risks increasing the MRL as by the provided documentation. In conclusion the MRL for apricots, peaches, and sheep milk will not see any change. For the following products there has been an increase in the MRL: Pome fruits from 0.09 to 0.4 mg/kg, for peas with pods from 2 to 9 mg/kg, for maize and corn from 0.2 to 0.3 mg/kg and for sugar beet roots from 0.2 to 0.3 mg/kg. Action: APEDA

Dichlorprop (including dichlorprop-P)³ is an herbicide used for post-emergence weed control, especially targeting weeds and brushes. Additionally, this herbicide also gets used as a plant growth regulator, allowing for bigger fruit and citrus crops. EFSA's⁴ extensive review back in October 2024 concluded that the MRL of dichlorprop and especially dichlorprop-P could be increased in cereal grains. Since cereal grains are typically fed to livestock, the carry-over effect was studied, and very little residue was found in livestock after the MRL increase. EFSA also found that the residue remaining in the soil and plants was very limited, and therefore assessed that the risk to consumer health is unlikely. This caused after a delay that the EU approved the MRL increase of Dichlorprop on the following products from 0.1 to 0.2 mg/kg: barley, oat, rye, and wheat. Action: APEDA, DAHD

Flupyradifurone⁵ is an insecticide used to control sap-sucking pests in a wide variety of crops and plants, but especially in fruits and vegetables.

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This insecticide is known for being absorbed by the crops it is used on, therefore causing a longer-term solution than other insecticides. This insecticide has been under review for almost 4 years by EFSA6. This is because in 2020 the Dutch and French authorities provided the EFSA with new data regarding the use of Flupyradifurone as an insecticide. Initially, this wasn't enough data to overrule the EU's MRL as it was already set, but it did trigger a series of additional studies investigating the insecticide further. Later, more data also from agricultural companies came in, especially regarding Flupyradifurone's impact on bees. After EFSA's comprehensive review was complete and the low toxicity level of Flupyradifurone was confirmed, the EU decided to increase the MRL for Flupyradifurone on several products in order to meet more international import standards, especially for agricultural imports from the USA, where this insecticide is more widely being used. However, due to concerns about the potential risk to bees, not all agricultural products received a significant MRL increase. Action: APEDA

A full list of the Maximum residue levels for Flupyradifurone on several agricultural products can be found here: https://agrinfo.eu/book-of-reports/maximum-residue-levels-for-flupyradifurone/pdf/

Methyl nonyl ketone (F)7 is used as an animal repellent rather than as a conventional pesticide. It is commonly used to deter household animals like cats and dogs; it can be used to protect agricultural farms from these animals. However, it is typically used to protect households, waste containers, and ornamental plants from household animals. EFSA's8 review in 2012 concluded that no approval requests had been submitted for the animal repellent. Consequently, following further research, the EU decided not to authorize its use because it was not being employed in any significant manner. However, it was subsequently discovered that a component of this repellent is naturally present in certain foods and has already received approval as a flavoring substance. In light of this established natural presence, it was determined that Methyl nonyl ketone could be reauthorized for use as a pesticide. Nonetheless, due to the potential risks associated with higher doses, a minimal Maximum Residue Limit (MRL) has been imposed on all applications of Methyl

nonyl ketone. Accordingly, the MRL for Methyl nonyl ketone has been set at 0.01 mg/kg for all agricultural products. Action: APEDA, DAHD

Phosphonic acid⁹ is used as an fungicide on crops such as salads, cucumbers, tomatoes, herbs, hops, strawberries, and vines. This fungicide doesn't work by destroying fungi but by instead triggering the plant's immune response. This causes the plant to be stronger against any infections. The EU has decided that for Phosphonic acid to redefine its residue definition, causing it to be under the same MRL as other phosphonates. The changes in MRL* has been listed below as the changes in MRL comes from several pesticides being redefined. Action: APEDA

Plant oils/Citronella oil¹0 is a biopesticide which primarily gets used as an insect repellent, mostly to deter mosquitoes, flies, gnats, and wasps. However it is known for having herbicidal and fungicidal properties as well. The same as with Phosphonic acid, Plant oils/Citronella oil have been redefined as being under the definition of phosphonic acid and its salts. Therefore, the same MRL will apply to Plant oils/Citronella oil as it does to phosphonic acid and its salts. The change in MRL has been listed below as the changes in MRL* comes from several pesticides being redefined. Action: APEDA, EIC

Potassium sorbate¹¹ is a multi-functional pesticide, it is being used as a fungicide, bactericide, and algicide. It is commonly used as a food-grade preservative post harvest, while also having pesticide properties. Therefore, it gets used as a seed treatment pesticide as well. The change in MRL has been listed below as the changes in MRL* comes from several pesticides being redefined. Action: APEDA

*The changes for Methyl nonyl ketone (F), Phosphonic acid and Plant oils/Citronella oil:

The following changes have been applied for MRL's on the following products¹²: For Leaf vegetables, herbs and edible flowers the MRL has increased from 150 to 200 mg/kg for purslanes it has increased from 100 to 200 mg/kg for chards/beet leaves it has increased from 70 to 200 mg/kg and for watercresses from 1.5 to 90 mg/kg. Then for globe artichokes it has increased from 100 to 150 mg/kg for poppy seeds from 1.5 to 200 mg/kg and finally for barley, oats, and rye the MRL has increased from 1.5 to 80 mg/kg.

B. EU Active Substance Renewal Monitor

I. The European Food Safety Authority (EfSA) open public consultation

EFSA regularly carries out public consultations on its scientific outputs. The stakeholders and other interested parties are encouraged to share their insights, data and other feedback on draft versions of the scientific assessments. The following active substances are open for public consultation;

Active substance	Deadline
Deltamethrin (Pesticides MRL) ¹³	07/05/2025
Pyridate (Pesticides Peer Review – AIR) ¹⁴	19/05/2025
Potassium Phosphonates (Pesticides MRL) ¹⁵	28/05/2025
Pseudomonas protegens strain DSMZ 13134 (Pesticides Peer Review - AIR) 16	30/05/2025
Potassium Phosphonates Pesticides Peer Review - AIR) 17	01/06/2025
Flurochloridone (Pesticides Peer Review - AIR) 18	03/06/2025
Proquinazid (Pesticides Peer Review -AIR) ¹⁹	13/06/2025
Disodium phosphonate (Ceradis source) (Pesticides Peer Review - AIR) $^{\!\! 20}$	15/06/2025
Disodium phosphonate (ISK source) ²¹	15/06/2025
Interpretation of FAIR principles for mechanistic effect models in regulatory environmental risk assessment of pesticides ²²	02/07/2025

II. Up next for review

Under the EU pesticide review program, active ingredients need to reapply for renewal three years before its expiration date. Substances listed below have upcoming deadlines for the submission of the renewal dossier;

Active substance	Date
Fenpicoxamid	11/10/2025
Metschnikowia fructicola strain NRRL Y27328	27/12/2025
Cypermethrin	31/01/2026
Beauveria bassiana strain IMI389521	19/02/2026
Beauveria bassiana strain PPRI 5339	20/02/2026
Florpyrauxifen	24/07/2026
Flutianil	14/04/2026
Mefentrifluconazole	20/03/2026

III. Active substances expected to expire

For the below active ingredients, applications for renewal of approval were not submitted or applications have been withdrawn.

Active substance	Date
Terpenoid blend QRD-460	10/08/2025
Methoxyfenozide	31/03/2026

C. EU News corner

I. European Commission's proposal to set maximum levels for inorganic arsenic for certain species of fish²³

The European Commission has announced plans to introduce maximum allowable levels of inorganic arsenic in fish and seafood. This amendment to Regulation (EU) 2023/915 follows updated assessments from the European Food Safety Authority (EFSA), which continue to highlight health concerns linked to chronic dietary exposure to inorganic arsenic. Fish, crustaceans, and Molluscs will now be subject to stricter contamination limits please see table 1 for a complete breakdown of the arsenic change for seafood. The regulation is expected to be adopted by July 2025 and take effect in the fourth quarter of the year.

Table 1: Maxium Levels of arsenic in seafoods		
Foods	Maxium level (mg/kg weight)	
Fish:		
Anglerfish and Monkfish		
Giant stargazer		
Flathfishes		
Haddock	0.50	
Herring	0.50	
Rays		
Shark		
Crustaceans:		
Crabs and crab-like crustaceans	0.10	
Prawns and shrimps	0.10	
Langoustines	1.5	
Rock Lobster	1.5	
Other crustaceans	0.20	
Molluscs:		
Scallops	0.10	
Other bivalve molluscs	0.50	
Caphalopds	0.050	

II. EIC authoritized to issue attestation of equivalence to hops and its products²⁴

The importation of hops and hop products into the European Union is subject to regulatory requirements, all hops export to the EU require an attestation of equivalence issued by an authorized agency. This agency must either be from the third country of origin or, if no such entity exists in the country of origin, from an already authorized agency outside that jurisdiction, The IEC applied for authorization from the EU in January 2025. On March 25, 2025, the European Commission confirmed the authorization of the EIC. This decision facilitates the entry of Indian hop exporters into the highly lucrative EU market, allowing India to capitalize on the growing potential of India's emerging hops industry.

III. Advisory for Jute bag manufacters: Contamination of food with mineral hydrocarbons²⁵

The European Commission is introducing stricter regulations on mineral oil hydrocarbons (MOHs), particularly mineral oil aromatic hydrocarbons (MOAH), due to their genotoxic carcinogenic properties. This change will set maximum allowable levels for MOAH in food, compelling businesses to adopt mitigation measures to comply. A key concern is the contamination caused by jute bags, a widely used packaging material, which has led to elevated levels of MOAH in certain foods, such as cacao beans. As India is a leading producer of jute bags, this regulatory shift will likely drive increased demand for mineral oil-free alternatives, such as vegetable oil-treated jute bags. To maintain access to the European market and align with evolving safety standards, Indian authorities are encouraged to inform and support manufacturers in adopting compliant packaging solutions, ensuring both consumer protection and sustained trade opportunities.

IV. Electronic system for Agricultural Non-customs formalities²⁶

The European Commission is proposing the establishment of the Electronic Agricultural Non-customs formalities system (ELAN) to streamline the management and verification of non-customs documents required in agrifood trade. This system will cover documents related to tariff rate quotas and authenticity certificates for Basmati rice, while also enabling EU authorities to issue and manage import licenses electronically. ELAN will

integrate with the EU Single Window Environment for Customs, supporting the broader shift towards electronic information exchange across customs and regulatory bodies. From January 17, 2028, non-EU authorities will be required to transmit relevant documents through ELAN or ensure their national systems are compatible with it, necessitating adjustments in their document processing infrastructure to maintain trade efficiency and compliance with EU regulations.

References

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