

**Potential Trade Effects on Selected Agricultural
Exporters to EU Under Regulation 1107/2009
("Hazard Based Cut-Offs")**



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Executive Summary

In 2009, the European Council adopted Regulation 1107/2009 revising the system used to regulate approval of the materials used in crop production to control damage from insects, weeds, animal pests and fungi.

In this regulation, a new set of categories was established under which substances deemed to be endocrine disruptors (ED), carcinogens, mutagens, or reproductive toxicants (CMR) will be subject to new approval/use criteria based solely on the identification of the hazard properties of these substances without an evaluation of the risk to human health at levels to which consumers are exposed to their residues in food. Substances which fall into these categories (“cut-off” substances) will be prohibited from use in the European Union, and current maximum residue levels (MRL) could be either withdrawn or set at a default level of 0.01 ppm¹.

The European Commission published a set of criteria documents² to be used in determining if a compound will be considered an endocrine disruptor subject to the 2009 legislation. These were issued on June 15, along with proposed amendments to regulation 1107/2009 and an impact analysis, including an annex reviewing potential effects on international trade³. This annex broadly discussed potential effects of cut-off of the ED, and to some extent the CMR, compounds. It identified some of the major cross-cutting effects on international trade, broad classes of effected commodities and major producers of those commodities and presented limited case studies concerning three commodities.

Previous analysis by the study author have identified potential effects of the new regulations based upon broad commodity groupings and assumptions of potentially affected crop protection substances published by various European national research groups.^{4,5} The purpose of this report is to provide a more detailed analysis of the effects of application of the proposed legislation and criteria for a number of specific countries, commodities and crop protection products.

Eighteen combinations of exporting countries and commodities were selected to represent a broad cross-section of all EU imports which potentially could be affected by the regulations. Based upon selection of a likely set of compounds that could be withdrawn from the market or have MRLs set at the default level, approximately €14 billion of EU imports of the selected commodities could be affected. A 2014 report by the author estimated similar effects on these commodities. Were this analysis extended to the entire range of potentially affected commodities imported by the EU, it is expected that the measures could have a potential impact on trade of around €65 billion, as projected in the earlier global analysis.

If important crop protection substances are no longer available for use on products exported to the EU, commodity producers will likely face financial consequences either from lost export markets, the costs of adapting different production systems to maintain those markets or to develop new export markets outside the EU. Depending on the substances eventually selected for application of the cut-off criteria, actual trade effects in each country will depend on the ways in which the exporting producers and industry can respond to the loss of particular substances or groups of substances.

Methodology

The Commission's impact assessment used screening techniques to identify substances which may meet the criteria proposed in amendments to Regulation 1107/2009. As highlighted by the Commission, *"...the results of the screening do not constitute evaluations of individual substances [...] and in no way prejudice future decisions on active substances. It would thus be erroneous to consider that the substances listed in Annex 5 are considered as endocrine disruptors within the meaning of the EU legislation."*

This report has been developed using a list of substances, both for endocrine disruptors and for CMR substances, which are most likely to be affected by the new rules of Regulation 1107/2009. The list of potential endocrine disrupting chemicals is based on the substances identified in 'Option 2' of the Commission's impact assessment, as the proposal for criteria put forward by the European Commission was largely based on Option 2.⁶ The identified CMR substance list is based on the current classification of substances together with a number of substances where EFSA has suggested a new CMR classification.⁷ Together, 49 substances were identified as potentially being affected by the "cut-off" criteria in the Regulation.

Based on this list, a selection of 18 specific combinations of effected commodities and major exporters to the EU of those commodities was developed [see Annex]. These combinations were chosen to be broadly representative of potentially affected types of commodities and countries from a variety of regions of the world. In many, but not all, cases the selected country is the largest exporter of the selected commodity to the EU. The volume of potentially affected trade covered is approximately 22% of the potential global impact identified in an earlier study.⁸

For each crop/country combination two sets of data were developed:

- For each exporting country/commodity combination volume and value data was extracted from the COMEXT database of EU trade covering the most recent three years (2013 – 2015) of exports to the EU. A three-year average was used in order to account for the major fluctuations in global commodity prices during the study period. Data was gathered at the highest level of specificity (6-digit level) in the World Customs Organization Harmonized Tariff System.
- For each country/commodity combination data was obtained concerning MRLs for each substance identified using the analysis described in Note 6. This data includes MRLs of the exporting country, MRLs of the EU, and MRLs established by the Codex Alimentarius Commission. There is no comprehensive, global and public database of MRLs. A variety of data sources were used in a hierarchical order:

- The Global MRL database made available to the public by the US Department of Agriculture.⁹ This database includes current MRLs, by commodity, for 103 countries and multi-lateral organizations. This data set is limited to MRL/commodity combinations where there is an existing U.S. MRL.
- The database of Codex Alimentarius pesticide MRLs, which includes MRLs for commodity/crop combinations not included in the Global MRL database.
- Individual national MRL lists where available, or information on crop protection substances from crop producers' associations.¹⁰
- An additional note was added to show countries that fully or partially adopt Codex MRLs in their national legislation.
- A list of current EU MRLs.¹¹

From these two data sources, tables were developed showing the substances used for each commodity/country combination and if the EU would permit imports of commodities based on the analysis of affected substances. It is assumed that reduction of MRLs to the default level of 0.01 ppm would preclude imports of crops treated with these active ingredients and that no separate import tolerances would be maintained permitting imports above the default MRL level. Where exports would not be permitted under these conditions, data tables of potential financial and volume effect were developed.

It is likely that the trade data presented in this report underestimates the potential effects of the regulations. The bulk of the trade information in this report is based on EU imports of primary agricultural products either for direct human consumption or further processing into food ingredients or animal feed ingredients. While the EU does not set individual MRLs for processed or combined products, these products must meet the basic safety requirements of Regulation 396/2005.¹²

Potential Effects of Withdrawal of Crop Protection Substances

Withdrawal of crop protection MRLs and import tolerances can lead to a number of adverse effects both to producers within the EU and exporters to the EU.

The Commission Impact Assessment defined and assessed potential impacts on EU producers including increased risk of crop losses, pest resistance and mycotoxin formation, lower crop production, increased prices, lower quality foods and reduced feed availability and quality.¹³

For crop exporters, a reduction in the number of crop protection substances available for their use on products destined for the EU can have the same effects. Exporters who use crop protection products subject to cut-off will face a number of options. These will be highly individualized depending on:

- The potential for substitution of alternative products serving the same technological function that are not subject to cut-off, are available in their country and have been approved for use in their country. Among other factors this will depend upon:
 - The ability of substitute products to be effective at levels that will meet EU MRLs, which are often already below international (Codex) MRLs.
 - The potential for insect/fungal resistance from loss of a number of products used in rotation as part of effective resistance management programs.
 - Cost of substitute products compared to current products.
 - Willingness of manufacturers to seek national and/or international MRLs for potential substitutes not currently approved in the exporting country.
 - The ability to establish segregated production and marketing systems for the EU to ensure that only commodities not treated with cut-off substances are exported.
- The ability of the exporter to locate and serve alternative markets (domestic or export) in cases where product substitution would not be achievable. Major considerations include:
 - The level of global competition and prices achievable in those markets, which can be dictated by many factors such as the costs of establishing marketing and logistics systems, freight, etc.
 - Price effects from diverting commodities away from a market which provides tariff preferences to 79 countries based on their classification under the Africa, Caribbean and Pacific program or as a Least Developed Country to countries that may impose higher tariffs.

- Regulatory considerations in the potential new export market. Crop protection MRLs are widely divergent around the world. For example, MRLs for raw agricultural products for one of the most widely used insecticides, malathion, range from 0.01 – 20 ppm depending on the country and commodity.
- The ability to divert farmland from production of commodities affected by the cut-off regulations to alternative products which may be exported to the EU and do not require the use of any products on the cut-off list. This would be dependent on:
 - The level of competition from both other global suppliers and EU producers of potential alternative commodity exports.
 - Agronomic conditions in the exporting country. Current export patterns have evolved over many years and are in large part dictated by climate, soil and adaptation of plant varieties to maximize production within an ecosystem.
 - The relative costs of agronomic inputs, and post-harvest handling and storage systems necessary to establish a new plant variety.

Taken together, these factors will present exporters with a complex, multifactorial decision process if the crop protection products they currently use are among those that may be subject to the “cut-off” criteria. It is beyond the scope of this report to attempt to analyze how any individual exporter would respond in this situation – only producers and exporters in the individual countries can properly analyze their options. However, each option would bear its own cost, whether from lost export markets, less effective plant disease control and costs (and potentially reduced returns) from switching to other export markets or switching to alternative export crops for the EU market.

Results of MRL Analysis and Trade Data

The Annex to this report contains tables of results of the compilation of national, EU and Codex MRLs for each substance identified through the ECPA analysis as likely “cut-off” substances, along with data on exports to the EU (volume and value) for each of the selected country/commodity combinations. The table below summarizes the number of MRLs for each combination which may be eliminated or reduced to default values along with the three-year average exports (in Euro) of that commodity to the EU.

Commodity	Country	Affected MRLs ¹⁴	3-year Average Exports to EU
Almonds	United States	14	€ 1,282,041,624
Apples/Pears	New Zealand	16	€ 170,264,500
Apples/Pears	South Africa	27	€ 245,458,994
Banana/Plantain	Colombia	9	€ 786,921,393
Citrus Fruits	Argentina	14	€ 199,115,417
Citrus Fruits	South Africa	12	€ 485,059,475
Cocoa	Ivory Coast	8 (see endnote 10)	€ 1,267,282,743
Coffee	Brazil	14	€ 2,221,106,531
Coffee	Mexico	4	€ 85,570,479
Table Grapes	Chile	18	€ 294,525,787
Palm/Palm Kernel Oil ¹⁵	Malaysia	9	€ 1,494,667,498
Peanuts	Argentina	12	€ 351,539,822
Peanuts	United States	8	€ 178,094,830
Rapeseed (Canola)	Australia	6	€ 666,353,704
Rice	India	7	€ 318,830,641
Soybeans	Brazil	17	€ 2,182,552,514
Soybeans	United States	12	€ 1,555,617,167
Wheat	Canada	6	€ 601,840,324
		TOTAL TRADE:	€ 14,386,843,443

This data demonstrates the potential impact of the “cut-off” criteria on trade with the EU. While MRLs may be in place for the identified substances, this study does not evaluate the actual commercial importance of those affected substances. In some cases, alternative products will be available and actually preferred by growers. This study does, however, highlight the potential effect of application of these new criteria, and suggests that farmers and exporters outside the European Union will likely face financial consequences either from lost export markets, the costs of adapting different production systems to maintain those markets or to develop new export markets outside the EU. Depending on the substances eventually selected for application of the cut-off criteria, actual trade effects in each country will depend on the ways in which the exporting producers and industry can respond to the loss or particular substances or groups of substances.

Annex

MRL and Trade Date for Selected Countries/Commodities

Almonds from United States.....	1
Apples and Pears from New Zealand.....	3
Apples and Pears from South Africa.....	7
Bananas from Colombia.....	11
Citrus Fruits from Argentina.....	13
Citrus Fruits from South Africa.....	15
Cocoa from Ivory Coast.....	17
Coffee from Brazil.....	19
Coffee from Mexico.....	21
Grapes (table only) from Chile.....	23
Palm and Palm Kernel Oil from Malaysia.....	25
Peanuts (groundnuts) from Argentina.....	27
Peanuts (groundnuts) from United States.....	29
Rapeseed (Canola) from Australia.....	31
Rice from India.....	33
Soybeans from Brazil.....	35
Soybeans from United States.....	37
Wheat from Canada.....	39

Affected MRLs highlighted in red, see endnote 14.

Almonds from the United States

Active substance	US	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.2	0.2	0.2	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.02		Herbicide		YES
Boscalid	0.7	1	0.05	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.1	0.1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.05	0.05	Insecticide		YES
Cyproconazole		0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.06	0.1	0.1	Insecticide		YES
Flumioxazin	0.02	0.05	0.02	Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**				Fungicide	R1B	
Folpet		0.02		Fungicide	C2 + R1B	
Glufosinate	0.1	0.1	0.1	Herbicide	R1B	
Iprodione	0.3	0.2	0.2	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	8	0.02		Insecticide		YES
Mancozeb	0.1	0.05	0.1	Fungicide		YES
Maneb		0.05	0.1	Fungicide		YES
Metiram		0.05	0.1	Fungicide		YES
Myclobutanil	0.1	0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.1	0.05		Herbicide		YES
Propyzamide		0.02		Herbicide		YES

Active substance	US	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen	0.1	0.1	0.05	Insecticide		YES
Tebuconazole	0.05	0.05	0.05	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid		0.02	0.02	Insecticide	R1B	
Thiophanate-methyl	0.1	0.2	0.1	Fungicide		YES
Thiram		0.1	0.1	Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	0.1	0.1	0.1	Fungicide		YES

*Does not adopt Codex MRLs, ** No longer approved in EU

EU IMPORTS - ALMONDS FROM US - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From US	% of Imports From US
Almonds In Shell	80211	Metric Tons	3,382	2,855	84.4%
Almonds Shelled	80212	Metric Tons	226,399	202,792	89.6%
Almonds In Shell	80211	Euros	€ 14,500,066	€ 12,609,969	87.0%
Almonds Shelled	80212	Euros	€ 1,417,811,102	€ 1,269,431,655	89.5%
All Almonds		Metric Tons	229,781	205,67	89.4%
		Euros	€ 1,432,311,168	€ 1,282,041,624	89.5%

Apples and Pears from New Zealand

Apples						
Active substance	NZ	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		0.05	0.1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole	0.01	0.01	0.05	Herbicide		YES
Boscalid	2	2	2	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	2	0.2		Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		1	0.7	Insecticide		YES
Cyproconazole		0.1		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.8	0.8	0.8	Insecticide		YES
Flumioxazin		0.02	0.02	Herbicide	R1B	
Flupyrsulfuron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet	10	3	10	Fungicide	C2 + R1B	
Glufosinate	0.1	0.1	0.1	Herbicide	R1B	
Iprodione		6	5	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	8	0.02	0.5	Insecticide		YES
Mancozeb	7	5	5	Fungicide		YES
Maneb		5		Fungicide		YES
Metiram	7	5	5	Fungicide		YES
Myclobutanil	0.1	0.6	0.6	Fungicide		YES
Oxadiazon	0.01	0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES

Apples						
Active substance	NZ	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Propyzamide		0.2		Herbicide		YES
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen	0.8	0.8	0.8	Insecticide		YES
Tebuconazole	1	0.3	1	Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.3		Fungicide		YES
Thiacloprid	0.7	0.3	0.7	Insecticide	R1B	
Thiophanate-methyl	3	0.5	3	Fungicide		YES
Thiram	7	5	5	Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.5		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	5	0.1	5	Fungicide		YES

*Does not adopt Codex MRLs, ** No longer approved in EU

Pears						
Active substance	NZ	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		0.05	0.1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole	0.01	0.01	0.05	Herbicide		YES
Boscalid	0.05	2		Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	2	0.2		Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		1	0.7	Insecticide		YES
Cyproconazole		0.1		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.8	0.8	0.8	Insecticide		YES

Pears						
Active substance	NZ	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Flumioxazin		0.02	0.02	Herbicide	R1B	
Flupyrsulfuron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet		3		Fungicide	C2 + R1B	
Glufosinate	0.1	0.1	0.1	Herbicide	R1B	
Iprodione		6	5	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	8	0.02		Insecticide		YES
Mancozeb	7	5		Fungicide		YES
Maneb		5		Fungicide		YES
Metiram		5		Fungicide		YES
Myclobutanil	0.1	0.6	0.6	Fungicide		YES
Oxadiazon	0.01	0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES
Propyzamide		0.02		Herbicide		YES
Pymetrozine		0.02		Insecticide	Interim (R2+C2)	
Spirodiclofen	0.8	0.8	0.8	Insecticide		YES
Tebuconazole	1	0.3	1	Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.3		Fungicide		YES
Thiacloprid	0.7	0.3	0.7	Insecticide	R1B	
Thiophanate-methyl	3	0.5	3	Fungicide		YES
Thiram		5		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.5		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	7	1	5	Fungicide		YES

*Does not adopt Codex MRLs, ** No longer approved in EU

EU IMPORTS - APPLES/PEARS FROM NEW ZEALAND - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From New Zealand	% of EU Imports
Apples, Fresh	080810	Metric Tons	539,368	125,932	23.3%
Apples, Dried	081330	Metric Tons	11,033	0	0.0%
Pears, Fresh	080830	Metric Tons	249,138	996	0.4%
Pears, etc., Dried	081340	Metric Tons	17,375	4	0.0%
Apples, Fresh	080810	Euros	€ 580,418,282	€ 168,931,495	29.1%
Apples, Dried	081330	Euros	€ 32,221,633	€ 562	0.0%
Pears, Fresh	080830	Euros	€ 275,614,105	€ 1,236,374	0.4%
Pears, etc., Dried	081340	Euros	€ 102,505,623	€ 96,068	0.1%
All Apples/Pears		Metric Tons	816,914	126,932	15.5%
		Euros	€ 990,759,642	€ 170,264,500	17.2%

Apples and Pears from South Africa

Apples						
Active substance	SA	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.05	0.05	0.1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01	0.05	Herbicide		YES
Boscalid	2	2	2	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	3	0.2		Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.5	1	0.7	Insecticide		YES
Cyproconazole	0.1	0.1		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.8	0.8	0.8	Insecticide		YES
Flumioxazin	0.02	0.02	0.02	Herbicide	R1B	
Flupyrsulfuron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone	0.2	0.1		Herbicide		YES
Flusilazole**	0.1	0.01		Fungicide	R1B	
Folpet	10	3	10	Fungicide	C2 + R1B	
Glufosinate	0.1	0.1	0.1	Herbicide	R1B	
Iprodione	2.5	6	5	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	0.5	0.02	0.5	Insecticide		YES
Mancozeb	5	5	5	Fungicide		YES
Maneb	3	5		Fungicide		YES
Metiram	5	5	5	Fungicide		YES
Myclobutanil	0.2	0.6	0.6	Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES

Apples						
Active substance	SA	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Propyzamide	0.02	0.2		Herbicide		YES
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen	0.8	0.8	0.8	Insecticide		YES
Tebuconazole	1	0.3	1	Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.3		Fungicide		YES
Thiacloprid	0.7	0.3	0.7	Insecticide	R1B	
Thiophanate-methyl	3	0.5	3	Fungicide		YES
Thiram	5	5	5	Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole	0.5	0.5		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	5	0.1	5	Fungicide		YES

*Does not adopt Codex MRLs, ** No longer approved in EU

Pears						
Active substance	SA	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.05	0.05	0.1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01	0.05	Herbicide		YES
Boscalid	2	2		Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	3	0.2		Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.5	1	0.7	Insecticide		YES
Cyproconazole	0.1	0.1		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.8	0.8	0.8	Insecticide		YES

Pears						
Active substance	SA	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Flumioxazin	0.02	0.02	0.02	Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone	0.2	0.1		Herbicide		YES
Flusilazole**	0.1	0.01		Fungicide	R1B	
Folpet		3		Fungicide	C2 + R1B	
Glufosinate	0.1	0.1	0.1	Herbicide	R1B	
Iprodione	2	6	5	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	0.02	0.02		Insecticide		YES
Mancozeb	5	5		Fungicide		YES
Maneb		5		Fungicide		YES
Metiram	3	5		Fungicide		YES
Myclobutanil	0.2	0.6	0.6	Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES
Propyzamide	0.02	0.02		Herbicide		YES
Pymetrozine		0.02		Insecticide	Interim (R2+C2)	
Spirodiclofen	0.8	0.8	0.8	Insecticide		YES
Tebuconazole	1	0.3	1	Fungicide		YES
Tepraloxydim	0.7	0.1		Herbicide		YES
Tetraconazole		0.3		Fungicide		YES
Thiacloprid		0.3	0.7	Insecticide	R1B	
Thiophanate-methyl	3	0.5	3	Fungicide		YES
Thiram	3	5		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole	0.5	0.5		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	5	1	5	Fungicide		YES

*Does not adopt Codex MRLs, ** No longer approved in EU

EU IMPORTS - APPLES/PEARS FROM SOUTH AFRICA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From South Africa	% of EU Imports
Apples, Fresh	080810	Metric Tons	539,368	114,257	21.2%
Apples, Dried	081330	Metric Tons	11,033	192	1.7%
Pears, Fresh	080830	Metric Tons	249,138	100,624	40.4%
Pears, etc., Dried	081340	Metric Tons	17,375	1,548	8.9%
Apples, Fresh	080810	Euros	€ 580,418,282	€ 128,988,401	22.2%
Apples, Dried	081330	Euros	€ 32,221,633	€ 1,094,962	3.4%
Pears, Fresh	080830	Euros	€ 275,614,105	€ 106,969,058	38.8%
Pears, etc., Dried	081340	Euros	€ 102,505,623	€ 8,406,573	8.2%
All Apples/Pears		Metric Tons	816,914	216,620	26.5%
		Euros	€ 990,759,642	€ 245,458,994	24.8%

Bananas from Colombia

Active substance	Colombia	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		0.05		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01		Herbicide		YES
Boscalid	0.6	0.6	0.6	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	0.2	0.1	0.2	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.05		Insecticide		YES
Cyproconazole		0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.5		Fungicide	C2 + R1B	YES
Fenamidone		0.2		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin		0.02		Herbicide	R1B	
Flupyrsulfuron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**	0.1	0.01	0.03	Fungicide	R1B	
Folpet		0.02		Fungicide	C2 + R1B	
Glufosinate	0.2	0.2	0.2	Herbicide	R1B	
Iprodione		0.01		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion		0.02		Insecticide		YES
Mancozeb	2	2	2	Fungicide		YES
Maneb		2		Fungicide		YES
Metiram	2	2	2	Fungicide		YES
Myclobutanil	2	2		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Colombia	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.3		Insecticide		YES
Tebuconazole	1.5	0.05	1.5	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid		0.01		Insecticide	R1B	
Thiophanate-methyl	0.2	0.1	0.2	Fungicide		YES
Thiram	2	0.2	2	Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Follows Codex if no National MRL, ** No longer approved in EU

EU IMPORTS - BANANAS AND PLANTAINS FROM COLOMBIA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Colombia	% of EU Imports
Fresh or Dried Plantains	080310	Metric Tons	82,884	42,215	50.9%
Fresh or Dried Bananas	080390	Metric Tons	5,015,284	1,184,103	23.6%
Fresh or Dried Plantains	080310	Euros	€ 46,510,930	€ 21,506,096	46.2%
Fresh or Dried Bananas	080390	Euros	€ 3,109,235,011	€ 765,415,297	24.6%
All Plantains and Bananas		Metric Tons	5,098,167	1,226,318	24.1%
		Euros	€ 3,155,745,941	€ 786,921,393	24.9%

Citrus Fruits from Argentina

Active substance	Argentina	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	2	1	1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01		Herbicide		YES
Boscalid	2	2	2	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	5	0.2 - 0.7	1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		2	0.3	Insecticide		YES
Cyproconazole		0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin	0.02	0.02		Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet		0.02	3	Fungicide	C2 + R1B	
Glufosinate	0.05	0.1 - 0.5	0.05	Herbicide	R1B	
Iprodione		0.01 - 6		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron	0.1	0.05		Herbicide	C2 + R1B	YES
Malathion	2	2	7	Insecticide		YES
Mancozeb	2	5	10 - Mandarin	Fungicide		YES
Maneb		5		Fungicide		YES
Metiram		5		Fungicide		YES
Myclobutanil		2 - 3		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Argentina	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.3		Insecticide	Interim (R2 + C2)	
Spirodiclofen	0.4	0.4 - 0.5	0.4	Insecticide		YES
Tebuconazole		0.9 - 5	0.15	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid		0.01	0.2	Insecticide	R1B	
Thiophanate-methyl		6		Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	2	0.1		Fungicide		YES

*Follows Codex if no National MRL, ** No longer approved in EU

Not all MRLs apply to all citrus fruits, ranges indicate levels permitted where different MRLs apply to sub-categories of citrus fruits

EU IMPORTS - CITRUS FRUITS FROM ARGENTINA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Argentina	% of EU Imports
Fresh or Dried Oranges	080510	Metric Tons	869,864	43,660	5.0%
Fresh or Dried Mandarins	080520	Metric Tons	363,101	10,647	2.9%
Grapefruit	080540	Metric Tons	350,003	379	0.1%
Fresh or Dried Lemons and Limes	080550	Metric Tons	415,098	141,130	34.0%
Fresh or Dried Citrus – Other	080590	Metric Tons	3,511	0	0.0%
Fresh or Dried Oranges	080510	Euros	€ 531,510,040	€ 29,425,508	5.5%
Fresh or Dried Mandarins	080520	Euros	€ 354,127,201	€ 9,772,291	2.8%
Grapefruit	080540	Euros	€ 252,082,415	€ 278,221	0.1%
Fresh or Dried Lemons and Limes	080550	Euros	€ 442,913,033	€ 159,638,881	36.0%
Fresh or Dried Citrus – Other	080590	Euros	€ 5,218,159	€ 515	0.0%
All Citrus Fruits		Metric Tons	2,001,577	195,816	9.8%
		Euros	€ 1,585,850,848	€ 199,115,417	12.6%

Citrus Fruits from South Africa

Active substance	SA	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	1	1	1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01		Herbicide		YES
Boscalid	2	2	2	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	5	0.2 - 0.7	1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.2	2	0.3	Insecticide		YES
Cyproconazole		0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin		0.02		Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet		0.02	3	Fungicide	C2 + R1B	
Glufosinate	0.1 - 0.5	0.1 - 0.5	0.05	Herbicide	R1B	
Iprodione	1	0.01 - 6		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	7	2	7	Insecticide		YES
Mancozeb	10	5	10	Fungicide		YES
Maneb		5		Fungicide		YES
Metiram		5		Fungicide		YES
Myclobutanil		2 - 3		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	SA	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.3		Insecticide	Interim (R2 + C2)	
Spirodiclofen	0.4 - 0.5	0.4 - 0.5	0.4	Insecticide		YES
Tebuconazole	0.2 - 0.9	0.9 - 5	0.15	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid		0.01	0.2	Insecticide	R1B	
Thiophanate-methyl		6		Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Follows Codex if no National MRL, ** No longer approved in EU

Not all MRLs apply to all citrus fruits, ranges indicate levels permitted where different MRLs apply to sub-categories of citrus fruits

EU IMPORTS - CITRUS FRUITS FROM SOUTH AFRICA - ANNUAL AVERAGE 2013 - 2015						
Product	HS Code	Unit	All EU Imports	From South Africa	% of EU Imports	
Fresh or Dried Oranges	080510	Metric Tons	869,864	414,043	47.6%	
Fresh or Dried Mandarins	080520	Metric Tons	363,101	87,042	24.0%	
Grapefruit	080540	Metric Tons	350,003	90,487	25.9%	
Fresh or Dried Lemons and Limes	080550	Metric Tons	415,098	34,422	8.3%	
Fresh or Dried Citrus – Other	080590	Metric Tons	3,511	253	7.2%	
Fresh or Dried Oranges	080510	Euros	€ 531,510,040	€ 279,105,247	52.5%	
Fresh or Dried Mandarins	080520	Euros	€ 354,127,201	€ 93,589,083	26.4%	
Grapefruit	080540	Euros	€ 252,082,415	€ 69,077,319	27.4%	
Fresh or Dried Lemons and Limes	080550	Euros	€ 442,913,033	€ 42,662,279	9.6%	
Fresh or Dried Citrus – Other	080590	Euros	€ 5,218,159	€ 625,547	12.0%	
All Citrus Fruits		Metric Tons	2,001,577	626,246	31.3%	
		Euros	€ 1,585,850,848	€ 485,059,475	30.6%	

Cocoa from Ivory Coast

Active substance	Ivory Coast	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	***	0.1		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.05		Herbicide		YES
Boscalid		0.01		Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone	***			Rodenticide	R1B	
Carbendazim**		0.1		Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	***	0.1		Insecticide		YES
Cyproconazole		0.05		Fungicide	R1B	YES
Desmedipham		0.05		Herbicide		YES
Difenacoum	***			Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	***	0.02		Insecticide		YES
Flumioxazin		0.1		Herbicide	R1B	
Flupyr-sulfuron-methyl		0.1		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.05		Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate		0.1		Herbicide	R1B	
Iprodione		0.05		Fungicide		YES
Isoxaflutole		0.1		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion	***	0.02		Insecticide		YES
Mancozeb		0.1		Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.05		Herbicide		YES
Pymetrozine	***	0.1		Insecticide	Interim (R2+C2)	

Active substance	Ivory Coast	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Spirodiclofen		0.05		Insecticide		YES
Tebuconazole		0.05		Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid	***	0.05		Insecticide	R1B	
Thiophanate-methyl		0.1		Fungicide		YES
Thiram		0.2		Fungicide		YES
Tralkoxydim		0.05		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.05		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.2		Fungicide		YES

*Adopts Codex MRLs, none established for these products, ** No longer approved in EU, ***MRLS unavailable, see endnote 10.

EU IMPORTS - COCOA FROM COTE D'IVOIRE - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Cote D'Ivoire	% of EU Imports
Cocoa Beans, Whole or Broken, Raw or Roasted	180100	Metric Tons	1,294,342	539,885	41.71%
Cocoa Beans, Whole or Broken, Raw or Roasted	180100	Euros	€ 3,030,721,990	€ 1,267,282,743	41.81%

Coffee from Brazil

Active substance	Brazil	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.1	0.1		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.05		Herbicide		YES
Boscalid	0.05	0.05	0.05	Fungicide		YES
Brodifacoum**	***			Rodenticide	R1A	
Bromadiolone	***			Rodenticide	R1B	
Carbendazim**		0.1	0.1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.05	0.1	0.5	Insecticide		YES
Cyproconazole	0.1	0.1	0.07	Fungicide	R1B	YES
Desmedipham		0.05		Herbicide		YES
Difenacoum	***			Rodenticide	R1A	
Difethialon**	***			Rodenticide	R1B	
Epoxiconazole	0.1	0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**	***			Rodenticide	R1B	
Flubendiamide		0.02		Insecticide		YES
Flumioxazin	0.05	0.1		Herbicide	R1B	
Flupyrifluron-methyl		0.1		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.05		Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate	0.05	0.1	0.1	Herbicide	R1B	
Iprodione	2	0.05		Fungicide		YES
Isoxaflutole		0.1		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion	0.01	0.02		Insecticide		YES
Mancozeb	0.3	0.1		Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil	0.1	0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.1	0.05		Herbicide		YES
Propyzamide		0.05		Herbicide		YES

Active substance	Brazil	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.1		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.05	0.03	Insecticide		YES
Tebuconazole	0.2	0.1	0.1	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole	0.8	0.02		Fungicide		YES
Thiacloprid		0.05		Insecticide	R1B	
Thiophanate-methyl	0.03	0.1		Fungicide		YES
Thiram		0.2		Fungicide		YES
Tralkoxydim		0.05		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.05		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.2		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU, *** Registered for general public health uses, no MRL specified

EU IMPORTS - COFFEE FROM BRAZIL - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Brazil	% of EU Imports
Coffee, not roasted or decaffeinated	090111	Metric Tons	2,818,759	888,496	31.5%
Coffee, not roasted, decaffeinated	090112	Metric Tons	7,174	48	0.7%
Coffee, roasted, not decaffeinated	090121	Metric Tons	44,235	377	0.9%
Coffee, roasted, decaffeinated	090122	Metric Tons	4,326	26	0.6%
Coffee, not roasted or decaffeinated	090111	Euros	€ 6,637,056,882	€ 2,219,306,701	33.4%
Coffee, not roasted, decaffeinated	090112	Euros	€ 20,491,957	€ 137,893	0.7%
Coffee, roasted, not decaffeinated	090121	Euros	€ 1,245,998,718	€ 1,568,233	0.1%
Coffee, roasted, decaffeinated	090122	Euros	€ 140,192,696	€ 93,704	0.1%
All Coffee		Metric Tons	2,874,494	888,947	30.9%
		Euros	€ 8,043,740,253	€ 2,221,106,531	27.6%

Coffee from Mexico

Active substance	Mexico	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		0.1		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.05		Herbicide		YES
Boscalid	0.05	0.05	0.05	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.1	0.1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.1	0.5	Insecticide		YES
Cyproconazole	0.1	0.1	0.07	Fungicide	R1B	YES
Desmedipham		0.05		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole	0.05	0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.02		Insecticide		YES
Flumioxazin		0.1		Herbicide	R1B	
Flupyrifurion-methyl		0.1		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.05		Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate		0.1	0.1	Herbicide	R1B	
Iprodione		0.05		Fungicide		YES
Isoxaflutole		0.1		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion		0.02		Insecticide		YES
Mancozeb		0.1		Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.05		Herbicide		YES

Active substance	Mexico	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.1		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.05	0.03	Insecticide		YES
Tebuconazole	0.15	0.1	0.1	Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid		0.05		Insecticide	R1B	
Thiophanate-methyl		0.1		Fungicide		YES
Thiram		0.2		Fungicide		YES
Tralkoxydim		0.05		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.05		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.2		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU

EU IMPORTS - COFFEE FROM MEXICO - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Mexico	% of EU Imports
Coffee, not roasted or decaffeinated	090111	Metric Tons	2,818,759	27,336	1.0%
Coffee, not roasted, decaffeinated	090112	Metric Tons	7,174	1,254	17.5%
Coffee, roasted, not decaffeinated	090121	Metric Tons	44,235	5	0.0%
Coffee, roasted, decaffeinated	090122	Metric Tons	4,326	88	2.0%
Coffee, not roasted or decaffeinated	090111	Euros	€ 6,637,056,882	€ 80,259,403	1.2%
Coffee, not roasted, decaffeinated	090112	Euros	€ 20,491,957	€ 4,896,159	23.9%
Coffee, roasted, not decaffeinated	090121	Euros	€ 1,245,998,718	€ 64,347	0.0%
Coffee, roasted, decaffeinated	090122	Euros	€ 140,192,696	€ 350,570	0.3%
All Coffee		Metric Tons	2,874,494	28,682	1.0%
		Euros	€ 8,043,740,253	€ 85,570,479	1.1%

Grapes (table) from Chile

Active substance	Chile	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.1	0.1	0.1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.05	0.05	Herbicide		YES
Boscalid	5	5	5	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.3	3	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.5	0.2	Insecticide		YES
Cyproconazole		0.2		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone	0.6	0.6	0.6	Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.01	2	2	Insecticide		YES
Flumioxazin	0.02	0.05	0.02	Herbicide	R1B	
Flupyrifurion-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet	10	0.02	10	Fungicide	C2 + R1B	
Glufosinate	0.1	0.15	0.15	Herbicide	R1B	
Iprodione	10	20	10	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	5	0.02	5	Insecticide		YES
Mancozeb	5	5	5	Fungicide		YES
Maneb		5		Fungicide		YES
Metiram		5		Fungicide		YES
Myclobutanil		1	0.9	Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Chile	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen	0.2	2	0.2	Insecticide		YES
Tebuconazole	2	0.5	6	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole		0.5		Fungicide		YES
Thiacloprid		0.01		Insecticide	R1B	
Thiophanate-methyl	3	0.1	3	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole	3	3	3	Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	5	0.1	5	Fungicide		YES

*Follows Codex if no National MRL, ** No longer approved in EU

EU IMPORTS - TABLE GRAPES FROM CHILE - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Chile	% of EU Imports
Fresh Grapes	080610	Metric Tons	593,587	128,282	21.6%
Dried Grapes	080620	Metric Tons	333,335	20,610	6.2%
Fresh Grapes	080610	Euros	€ 1,211,382,552	€ 248,730,916	20.5%
Dried Grapes	080620	Euros	€ 594,615,381	€ 45,794,872	7.7%
All Table Grapes		Metric Tons	926,922	148,892	16.1%
		Euros	€ 1,805,997,933	€ 294,525,787	16.3%

Palm and Palm Kernel Oil from Malaysia

Active substance	Malaysia****	EU***	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.05	0.05		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.02		Herbicide		YES
Boscalid		0.01		Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.1		Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.5	0.05		Insecticide		YES
Cyproconazole	0.1	0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin		0.05		Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone				Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet		0.07		Fungicide	C2 + R1B	
Glufosinate	0.5	0.1		Herbicide	R1B	
Iprodione		0.01		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion		0.02		Insecticide		YES
Mancozeb	1	0.1		Fungicide		YES
Maneb	1	0.1		Fungicide		YES
Metiram	1	0.1		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Malaysia****	EU***	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.05		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole		0.02		Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.02		Fungicide		YES
Thiacloprid		0.02		Insecticide	R1B	
Thiophanate-methyl		0.1		Fungicide		YES
Thiram	1	0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram	1	0.1		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU, *** MRLs are for raw agricultural product, ****MRLs are for processed oil

EU IMPORTS - PALM AND PALM KERNEL OIL FROM MALAYSIA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Malaysia	% of EU Imports
Palm Oil, Crude	151110	Metric Tons	4,923,687	1,483,489	30.1%
Palm Oil, Refined	151190	Metric Tons	1,909,229	510,900	26.8%
Palm Kernel and Babassa Oil, Crude	151321	Metric Tons	453,122	134,584	29.7%
Palm Kernel and Babassa Oil, Refined	151329	Metric Tons	190,186	61,979	32.6%
Palm Oil, Crude	151110	Euros	€ 3,172,261,092	€ 951,839,633	30.0%
Palm Oil, Refined	151190	Euros	€ 1,279,258,276	€ 375,412,887	29.3%
Palm Kernel and Babassa Oil, Crude	151321	Euros	€ 356,457,955	€ 106,795,990	30.0%
Palm Kernel and Babassa Oil, Refined	151329	Euros	€ 162,150,473	€ 60,618,989	37.4%
All Palm and Palm Kernel Oil		Metric Tons	7,476,224	2,190,952	29.3%
		Euros	€ 4,970,127,796	€ 1,494,667,498	30.1%

Peanuts (groundnuts) from Argentina

Active substance	Argentina	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.2	0.05		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.2		Herbicide		YES
Boscalid	1	1	1	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	0.1	0.1	0.1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.1		Insecticide		YES
Cyproconazole	0.5 - 0.2	0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole	0.05	0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin	0.02	0.05	0.02	Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone	0.1			Herbicide		YES
Flusilazole**	0.05	0.01		Fungicide	R1B	
Folpet		0.02		Fungicide	C2 + R1B	
Glufosinate		0.1		Herbicide	R1B	
Iprodione		0.01		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion		0.02		Insecticide		YES
Mancozeb	0.2	0.1	0.1	Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Argentina	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.05	0.15	0.15	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole	0.05	0.02		Fungicide		YES
Thiacloprid		0.02		Insecticide	R1B	
Thiophanate-methyl	0.1	0.1	0.1	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Follows Codex if no National MRL, **No longer approved in EU

EU IMPORTS - PEANUTS FROM ARGENTINA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Argentina	% of EU Imports
Groundnuts (Peanuts), In-Shell, Roasted	120241	Metric Tons	73,492	631	0.9%
Groundnuts (Peanuts), Shelled, Roasted	120242	Metric Tons	551,785	299,390	54.3%
Groundnuts (Peanuts), In-Shell, Roasted	120241	Euros	€ 109,111,088	€ 601,636	0.6%
Groundnuts (Peanuts), Shelled, Roasted	120242	Euros	€ 659,137,395	€ 350,938,186	53.2%
All Groundnuts (Peanuts), Roasted		Metric Tons	625,277	300,020	48.0%
		Euros	€ 768,248,483	€ 351,539,822	45.8%

Peanuts (groundnuts) from United States

Active substance	US	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		0.05		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.2		Herbicide		YES
Boscalid	0.05	1	1	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.1	0.1	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.1		Insecticide		YES
Cyproconazole	0.01	0.05		Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.02	0.01		Insecticide		YES
Flumioxazin	0.02	0.05	0.02	Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone				Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet		0.02		Fungicide	C2 + R1B	
Glufosinate		0.1		Herbicide	R1B	
Iprodione	0.5	0.01		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion	8	0.02		Insecticide		YES
Mancozeb	0.1	0.1	0.1	Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.1	0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	US	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.1	0.15	0.15	Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole	0.03	0.02		Fungicide		YES
Thiacloprid		0.02		Insecticide	R1B	
Thiophanate-methyl	0.1	0.1	0.1	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Does not adopt Codex MRLs, ** No longer approved in EU

EU IMPORTS - PEANUTS FROM THE US - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From US	% of EU Imports
Groundnuts (Peanuts), In-Shell, Roasted	120241	Metric Tons	73,492	31,489	42.8%
Groundnuts (Peanuts), Shelled, Roasted	120242	Metric Tons	551,785	118,064	21.4%
Groundnuts (Peanuts), In-Shell, Roasted	120241	Euros	€ 109,111,088	€ 41,664,815	38.2%
Groundnuts (Peanuts), Shelled, Roasted	120242	Euros	€ 659,137,395	€ 136,430,015	20.7%
All Groundnuts (Peanuts), Roasted		Metric Tons	625,277	149,553	23.9%
		Euros	€ 768,248,483	€ 178,094,830	23.2%

Rapeseed (Canola) from Australia

Active substance	Australia	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		0.05		Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.02		Herbicide		YES
Boscalid	3.5	1	1	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.1	0.05	Fungicide	M1B & R1B	
Carbetamide		0.1		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.2	0.2		Insecticide		YES
Cyproconazole		0.4	0.4	Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin		0.05		Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01	0.1	Fungicide	R1B	
Folpet		0.07		Fungicide	C2 + R1B	
Glufosinate	5	5	1.5	Herbicide	R1B	
Iprodione	0.5	0.5	0.5	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.1		Herbicide	C2 + R1B	YES
Malathion		0.02		Insecticide		YES
Mancozeb		0.5		Fungicide		YES
Maneb		0.5		Fungicide		YES
Metiram		0.5		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide	0.02	0.01		Herbicide		YES

Active substance	Australia	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine				Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.3	0.5	0.3	Fungicide		YES
Tepraloxydim	0.1	0.8		Herbicide		YES
Tetraconazole		0.15		Fungicide		YES
Thiacloprid		0.6	0.5	Insecticide	R1B	
Thiophanate-methyl		0.1	0.5	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU

EU IMPORTS - RAPESEED (CANOLA) FROM AUSTRALIA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Australia	% of EU Imports
Low Euricic Acid Rapeseed	120510	Metric Tons	3,189,464	1,538,855	48.2%
Low Euricic Acid Rapeseed	120510	Euros	€ 1,316,853,888	€ 666,353,704	50.6%

Rice from India

Active substance	India	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.01	0.1	0.1	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01		Herbicide		YES
Boscalid		0.15	0.1	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.01	2	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.01	2	2	Insecticide		YES
Cyproconazole		0.1	0.08, wild	Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.1		Fungicide	C2 + R1B	YES
Fenamidone		0.2		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.1	0.2		Insecticide		YES
Flumioxazin		0.02		Herbicide	R1B	
Flupyrsulfuron-methyl		0.02		Herbicide	Interim (R2 + C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**	0.01			Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate		0.9	0.9	Herbicide	R1B	
Iprodione	10	10	10	Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2 + C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	4	8		Insecticide		YES
Mancozeb	0.2	0.05		Fungicide		YES
Maneb		0.05		Fungicide		YES
Metiram		0.05		Fungicide		YES
Myclobutanil		0.02		Fungicide		YES
Oxadiazon	0.03	0.05		Herbicide		YES
Pendimethalin	0.05	0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	India	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine	0.01	0.05		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.05	1	1.5	Fungicide		YES
Tepraloxymid		0.1		Herbicide		YES
Tetraconazole		0.05		Fungicide		YES
Thiacloprid	0.01	0.02	0.02	Insecticide	R1B	
Thiophanate-methyl		0.01	2	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU

EU IMPORTS - RICE FROM INDIA - ANNUAL AVERAGE 2013 - 2015						
Product	HS Code	Unit	All EU Imports	From India	% of EU Imports	
Rice in Husk, "Paddy" or Rough	100610	Metric Tons	26,020	13	0.0%	
Rice, Husked or Brown	100620	Metric Tons	683,050	307,982	45.1%	
Rice, Semi-milled or Wholly milled	100630	Metric Tons	636,182	68,214	10.7%	
Rice, Broken	100640	Metric Tons	318,878	5,263	1.7%	
Rice in Husk, "Paddy" or Rough	100610	Euro	€ 8,016,858	€ 8,321	0.1%	
Rice, Husked or Brown	100620	Euro	€ 474,189,341	€ 250,253,515	52.8%	
Rice, Semi-milled or Wholly milled	100630	Euro	€ 455,072,084	€ 66,702,099	14.7%	
Rice, Broken	100640	Euro	€ 104,930,483	€ 1,866,706	1.8%	
All Rice		Metric Tons	1,664,129	381,472	22.9%	
		Euros	€ 1,042,208,766	€ 318,830,641	30.6%	

Soybeans from Brazil

Active substance	Brazil	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.1	0.05	0.01	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.02		Herbicide		YES
Boscalid	0.01	3	3	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**	0.5 (seed)	0.2	0.05	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin	0.05	0.05		Insecticide		YES
Cyproconazole	0.05	0.07	0.07	Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.05	0.01	1	Insecticide		YES
Flumioxazin	0.1	0.05	0.02	Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01		Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate	1.5	2	2	Herbicide	R1B	
Iprodione	0.5	0.01		Fungicide		YES
Isoxaflutole	0.02	0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron	1	0.1		Herbicide	C2 + R1B	YES
Malathion	0.01	0.02		Insecticide		YES
Mancozeb	0.3	0.1		Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil	0.02	0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.1	0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Brazil	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.1	0.15	0.15	Fungicide		YES
Tepraloxydim	0.2	5		Herbicide		YES
Tetraconazole	0.1	0.02		Fungicide		YES
Thiacloprid	0.1	0.02		Insecticide	R1B	
Thiophanate-methyl	0.5	0.3	0.5	Fungicide		YES
Thiram	0.3	0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU

EU IMPORTS - SOYBEANS FROM BRAZIL - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Brazil	% of EU Imports
Soybeans	120190	Metric Tons	13,099,710	5,381,281	41.1%
Soybeans	120190	Euros	€ 5,251,499,174	€ 2,182,552,514	41.6%

Soybeans from United States

Active substance	US	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D	0.02	0.05	0.01	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.02		Herbicide		YES
Boscalid	0.1	3	3	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.2	0.05	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		0.05		Insecticide		YES
Cyproconazole	0.05	0.07	0.07	Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.05		Fungicide	C2 + R1B	YES
Fenamidone		0.05		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide	0.25	0.01	1	Insecticide		YES
Flumioxazin	0.02	0.05	0.02	Herbicide	R1B	
Flupyrsulfuron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01	0.05	Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate	2	2	2	Herbicide	R1B	
Iprodione		0.01		Fungicide		YES
Isoxaflutole	0.05	0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron	1	0.1		Herbicide	C2 + R1B	YES
Malathion	8	0.02		Insecticide		YES
Mancozeb		0.1		Fungicide		YES
Maneb		0.1		Fungicide		YES
Metiram		0.1		Fungicide		YES
Myclobutanil		0.05		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin	0.1	0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	US	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.02		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.08	0.15	0.15	Fungicide		YES
Tepraloxymid		5		Herbicide		YES
Tetraconazole	0.15	0.02		Fungicide		YES
Thiacloprid		0.02		Insecticide	R1B	
Thiophanate-methyl	0.2	0.3	0.5	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim		0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU

EU IMPORTS - SOYBEANS FROM UNITED STATES - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From US	% of EU Imports
Soybeans	120190	Metric Tons	13,099,710	3,989,153	30.5%
Soybeans	120190	Euros	€ 5,251,499,174	€ 1,555,617,167	29.6%

Wheat from Canada

Active substance	Canada	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
2,4-D		2	2	Herbicide		YES
8-Hydroxyquinoline incl. oxyquinoleine		0.01		Fungicide	R1B	YES
Amitrole		0.01		Herbicide		YES
Boscalid	0.2	0.8	0.5	Fungicide		YES
Brodifacoum**				Rodenticide	R1A	
Bromadiolone				Rodenticide	R1B	
Carbendazim**		0.1	0.05	Fungicide	M1B & R1B	
Carbetamide		0.05		Herbicide	C2 + R1B	
Chlorophacinone**				Rodenticide	R1B	
Cypermethrin		2	2	Insecticide		YES
Cyproconazole		0.1	0.08	Fungicide	R1B	YES
Desmedipham		0.01		Herbicide		YES
Difenacoum				Rodenticide	R1A	
Difethialon**				Rodenticide	R1B	
Epoxiconazole		0.6		Fungicide	C2 + R1B	YES
Fenamidone		0.02		Fungicide		YES
Flocoumafen**				Rodenticide	R1B	
Flubendiamide		0.01		Insecticide		YES
Flumioxazin	0.02	0.02	0.04	Herbicide	R1B	
Flupyrifluron-methyl		0.02		Herbicide	Interim (R2+C2)	
Flurochloridone		0.1		Herbicide		YES
Flusilazole**		0.01	0.2	Fungicide	R1B	
Folpet				Fungicide	C2 + R1B	
Glufosinate	0.2	0.1		Herbicide	R1B	
Iprodione		0.02		Fungicide		YES
Isoxaflutole		0.02		Herbicide	Interim (R2+C2)	
Lenacil		0.1		Herbicide		YES
Linuron		0.05		Herbicide	C2 + R1B	YES
Malathion	8	8	10	Insecticide		YES
Mancozeb		1	1	Fungicide		YES
Maneb		1		Fungicide		YES
Metiram		1		Fungicide		YES
Myclobutanil		0.02		Fungicide		YES
Oxadiazon		0.05		Herbicide		YES
Pendimethalin		0.05		Herbicide		YES
Propyzamide		0.01		Herbicide		YES

Active substance	Canada	EU	Codex*	Functional Use	CMR Based on EFSA/ECHA	Option 2 - ED
Pymetrozine		0.05		Insecticide	Interim (R2 + C2)	
Spirodiclofen		0.02		Insecticide		YES
Tebuconazole	0.15	0.3	0.15	Fungicide		YES
Tepraloxydim		0.1		Herbicide		YES
Tetraconazole		0.1		Fungicide		YES
Thiacloprid		0.1		Insecticide	R1B	
Thiophanate-methyl		0.05	0.05	Fungicide		YES
Thiram		0.1		Fungicide		YES
Tralkoxydim	0.02	0.02		Herbicide		YES
Triflumizole		0.1		Fungicide	R1B	YES
Triflurosulfuron		0.02		Herbicide		YES
Warfarin**		0.01		Rodenticide	R1B	
Ziram		0.1		Fungicide		YES

*Does not adopt Codex MRLs, **No longer approved in EU

EU IMPORTS - WHEAT FROM CANADA - ANNUAL AVERAGE 2013 - 2015					
Product	HS Code	Unit	All EU Imports	From Canada	% of EU Imports
Durum Wheat	100119	Metric Tons	2,124,732	1,427,157	67%
Wheat and Meslin	100199	Metric Tons	2,784,149	616,617	22%
Durum Wheat	100119	Euros	€ 673,634,543	€ 433,599,915	64%
Wheat and Meslin	100199	Euros	€ 641,679,577	€ 168,240,409	26%
All Wheat - Canada		Metric Tons	4,908,881	2,043,774	42%
		Euros	€ 1,315,314,121	€ 601,840,324	46%

Endnotes

¹ Regulation (EC) No 396/2005, Article 18.1(b)

² http://ec.europa.eu/health/endocrine_disruptors/docs/2016_pppcriteria_en.pdf

³ Communication COM(2016) 350 final, Staff Working Documents SWD(2016) 211 final, and SWD (2016) 212 final:

http://ec.europa.eu/health/endocrine_disruptors/docs/com_2016_350_en.pdf

http://ec.europa.eu/health/endocrine_disruptors/docs/2016_impact_assessment_en.pdf

http://ec.europa.eu/health/endocrine_disruptors/docs/2016_impact_assessment_annex_en.pdf

⁴ Extended impact assessment study of the human health and environmental criteria for endocrine disrupting substances proposed by HSE, CRD, WRc Ref: Defra 9088.01, WRc plc, Swinford, Wiltshire, UK, January 2013.

⁵ Agronomic and economic impact assessment for possible human health and ecotoxicology criteria for endocrine disrupting substances. The Food and Environment Research Agency, Sand Hutton, York UK, June 2013.

⁶ This list is based only on the Commission's impact assessment report of June 15' 2016. (see "impact assessment" link, note 3). An additional report and list was published on June 30 with a different sub-set of substances were identified as potential endocrine disruptors based on Option 2; this report has not been taken into account. The differences in the reports highlight the uncertainty in the assessment of the final impact on substances. The June 30 report can be found at:

:http://ec.europa.eu/health/endocrine_disruptors/docs/2016_impact_assessment_study_en.pdf

⁷ List assembled with the technical support of the European Crop Protection Association, a member association of the sponsor of this report.

⁸ Potential Trade Effects on World Agricultural Exporters of European Union Regulations on Endocrine Disruptors. Kyd D. Brenner LLC, February 2014.

⁹ <https://www.globalmrl.com>

¹⁰ Many countries adopt Codex MRLs as national MRLs (Opportunities for Harmonization in Global Color Regulations, Kevin C. Kenny, J.D., LL.M., Decernis, December 2015). Cote D'Ivoire is among those countries. No Codex MRLs have been set for any of the active substances reviewed in this report. Because there are neither national or Codex MRLs available, substances likely to be used in cocoa production have been drawn from Appendix 3 of the International Cocoa Commission *Manual on the Safe Use of Pesticides in Cocoa Growing*, <http://www.icco.org/sites/sps/manual.html>

¹¹ <http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=homepage&language=EN>

¹² According to Article 20 of Regulation No. 396/2005, MRLs for pesticides in processed products shall be the MRL for the relevant raw agricultural material "taking into account changes in the levels of pesticide residues caused by processing and/or mixing." These levels are not currently established at the E.U. level, but are handled at the national level.

¹³ Annexes 10, 12, 13 and 14

¹⁴ "Affected" MRLs include those where the exporting country MRL is above 0.01 and the EU MRL is currently above 0.01 or there is no current EU MRL and substances no longer permitted for use within the EU with MRLs above 0.01. Substances where either the national or EU MRL is currently 0.01 are not included in this group.

¹⁵ Malaysian MRLs are for the processed products palm oil and palm kernel oil. EU MRLs are for the raw agricultural products oil palms kernels and oil palms fruits. The E.U. association representing oilseed processors, (FEDIOL) has provided guidance on calculating "transfer factors" for pesticide residues in crude vegetable oils at the link below. Seventy-five percent of EU imports of palm and palm kernel oils are in the crude form. http://www.fediol.be/data/fediol_11SAF181_3578.pdf

This report was prepared with the financial support of Crop Life International. The methodology, assumptions and all data presented were independently prepared by the author and any errors are the responsibility of the author. Information about the study author may be found at: <http://www.dtbassociates.com/kyd-brenner.html>