



COLEACP

MANCOZEB IN THE EUROPEAN UNION APPROVAL AND MRL CHANGES

TECHNICAL NOTE
03/11/20

Mancozeb is a fungicide for the control of a wide range of pathogens.

It is used on many key horticultural crops including: amaranth, apples, avocado, baby & sweet corn, banana, beans, broccoli, carrot, cauliflower, celery, citrus, coconut, cruciferae, cucumber, cucurbits, guava, head cabbage, kale, lettuce, mango, melon, onion, papaya, pea, pepper, potato, squash, sweet potato, tomato, tuber crops, and watermelon.

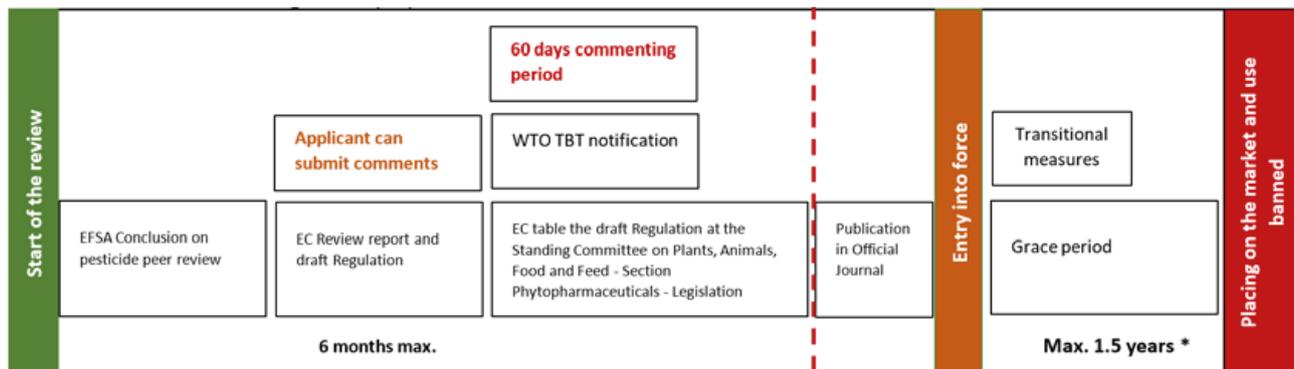
NON-RENEWAL OF APPROVAL OF MANCOZEB IN THE EUROPEAN UNION

On April 17 2020, The European Commission notified the World Trade Organisation of its decision not to renew the approval of the active substance mancozeb. **The 60 days commenting period is now over.**

On 23 October, EU Member States voted in favour of the non-renewal. In particular, it was concluded that mancozeb has been classified as toxic for reproduction category 1B and that the new criteria to identify endocrine disrupting properties are met for humans, and most likely for non-target organisms.

The [Adopted Regulation](#) should be published in the Official Journal in December, with details on the retained transitional measures and grace period (6 months, see annex I). COLEACP will keep you informed as more information becomes available.

Non-renewal of PPP under Regulation (EC) No 1107/2009



* The maximum period for transitional measures is not defined by Regulation (EC) No 1107/2009. The common understanding is that the EU MSs should be provided with sufficient administrative time to withdraw authorisations at national level. The time period provided for transitional measures overlaps with the grace period. The grace period shall be limited and not exceed 6 months for sale and distribution, with an additional maximum 1 year for the disposal, storage, and use of existing stocks.





EXPECTED DELAY IN IMPLEMENTING THE MANCOZEB MRL CHANGE FOLLOWING NON-RENEWAL

Following non-renewal of EU authorizations, and the expiry of all grace periods, the maximum residue levels (MRLs) are generally lowered to the limit of determination (LOD): 0.01 mg/kg. In most cases this means that these substances can no longer be used on crops for export to the EU, following the grace period. This is expected to be the case for mancozeb.

Mancozeb MRLs are covered under the MRLs for the dithiocarbamate group, which includes maneb, metiram, propineb, thiram and ziram. Dithiocarbamates also have a common residue definition expressed as carbon disulphide. Other active substances within this group are currently under renewal/review.

According to EU legislation, the MRLs cannot be lowered individually for mancozeb without affecting other substances in the dithiocarbamate group. The group therefore must be reviewed as a whole, taking into account the fact that some substances are still approved, others are no longer approved, and that there may be additional sources of carbon disulphide (due to natural occurrence, for instance in broccoli).

Because of these peculiarities in the residue definition, the MRL for mancozeb will not be lowered immediately after the non-renewal and expiration of the grace period, as would normally be the case. The European Commission now intends to initiate a collective review of dithiocarbamate MRLs, which will take time¹. The MRL review progress is updated on a quarterly basis and published on the EFSA website ([here](#)) and, as yet, the exact date for the start of the dithiocarbamate review process is not yet announced (update expected in the course of November 2020).

Based on the information available, COLEACP predicts that the Mancozeb MRLs are not likely to be lowered before the end of 2021. However, this is not definite, and the situation may change. Updated information will be issued as soon as it becomes available

ALTERNATIVES TO MANCOZEB (ADAPTED FROM IHS MARKIT, 2020)

Due to its multi-site action, mancozeb is a broad-spectrum fungicide used in a great number of mixtures to provide critical additional modes of action as part of resistance management strategies.

There are few true alternatives that can match its broad spectrum of activity and low cost, which is often critical in many developing countries. Given the resistance of many older fungicide classes, it is highly likely that as an alternative a greater array of mixtures will have to be employed, featuring newer modes of action (MoA).

In terms of new products under development with novel MoAs and activity in rice, F&V and/or cereals (key crops for mancozeb) the active ingredients include: fenpicoxamid, florylpicoxamid, metyltetraprole, aminopyrifin and quinofumelin.

¹ Based on previous experience of active substances reviews, the approximate timeframe between the start of data collection and expected date of adoption of a Reasoned Opinion (RO) is 12-18 months. This is followed by a standard process which includes: discussions with EU Member States; notification to the WTO SPS (60 days commenting period); scrutiny by European Parliament and Council (2 months); vote by EU Member States (Standing Committee on Pesticide Residues); and publication in the Official Journal of the EU. Generally, the process between the vote at the Standing Committee and publication in the Official Journal takes approximately 3-4 months. After entry into force, the application date of the regulation is usually deferred for 6 months to allow Member States, third countries and food business operators time to prepare for the changes (grace period).



REFERENCE

IHS Markit. (2020). EU RE-REGISTRATION UPDATE, GLOBAL BANS AND REPLACEMENT STRATEGIES - Topical Insight & Analysis from Phillips McDougall. AgriFutura, 245(March), 1–30.

ANNEX

At the meeting on 23 October, there was one last minute change right before the vote took place. Article 3 of Draft Regulation was amended: transitional measure period of 3 months was replaced by 6 months.

The Draft Commission Implementing Regulation should be read as follows:

Article 3 Transitional measures

Member States shall withdraw authorisations for plant protection products containing mancozeb as an active substance by [Office of Publications please insert date 6 months from the date of entry into force].

Article 4 Grace period

Any grace period granted by Member States in accordance with Article 46 of Regulation (EC) No 1107/2009 shall expire by [Office of Publications please insert date 6 months from the date of entry into force].