DECEMBER 2025

BRYANT CHRISTIE INC.

ISSUES REVIEW

Cranberry MRL Issues

2025 Cranberry MRL Monitoring Overview

Since January 2025, BCI has reviewed over **400** notifications and has informed the cranberry industry of **39** MRL changes across **eight** markets, including **six** MRL changes in the European Union, **four** MRL changes in Japan, **two** MRL changes in Canada, **two** MRL changes in Australia, **one** MRL change in change in Costa Rica, **two** MRL changes in Mexico, **18** MRL changes in Indonesia, and **four** MRL changes in the Gulf Cooperation Council.

EU Call for Evidence for the *Food and Feed Safety Simplification Omnibus*

The *Food and Feed Safety Simplification Omnibus* is a European Commission initiative to simplify and strengthen EU food and feed safety rules. This initiative could propose changes to multiple EU regulations, including *Regulation (EC) 1107/2009* (approval of active ingredients) and *Regulation (EC) 396/2005* (MRLs for pesticides).

One of the objectives of this initiative is to clarify terminology and transition periods for MRLs. Comments were submitted to the European Commission on behalf of the cranberry industry to highlight the importance of establishing a clear and consistent *channels of trade* policy. Such a policy would allow products to comply with the MRL at the time of application, should an MRL be restricted or withdrawn after harvest or while a crop is in storage.

There remains a lack of policies worldwide that address the regulatory uncertainty created when standards change after the growing season, especially for products with a long shelf life and can remain in storage for years, such as cranberries. It is not possible to forecast potential MRL changes two to three years ahead. Some countries have established best practices for managing these risks to trade: 1) longer transition periods between the MRL change announcements and implementation, 2) accepting a product with documentation that the product was treated before the MRL was changed, and 3) enforcement discretion at the point of import to determine if the product poses a food safety risk.

This is especially challenging for cranberry products, including processed products, such as dried cranberries and cranberry juice, which have a long shelf life, and the residues can be detected years after application. The industry's comments emphasized the importance of establishing a reasonable policy that would allow products with a long shelf-life to remain compliant within trade channels.

The EU is the largest export market for cranberries, including concentrate, juice, dried, and fresh products. In 2024, North American cranberry exports to the EU were worth $87 million (USDA GATS and ISED Canada).

EU MRL Policy Impact Assessment

As highlighted in the August 2025 *Issues Review,* under the "EU Vision for Agriculture and Food," the European Commission intends to conduct an MRL Policy Impact Assessment. At this time, the methodology and timeline are not available, but it is expected that this effort will be led by Directorate General (DG) AGRI (the agriculture ministry).

The goal of this assessment is to evaluate the impact of the current MRL *Regulation (EC) 396/2005* on EU competitiveness. Findings may lead to changes within the regulation, regarding import tolerances and the maintenance of EU MRLs for substances that are no longer approved for use in the European Union.

Based on conversations with DG SANTE in September 2025, the EU Commission has paused major MRL changes until this impact assessment is complete.

When the EU announces this assessment, there will be an opportunity to provide comments. BCI will continue to monitor and inform the industry when additional information becomes available.

Targeted MRL Review – Quinclorac

It is expected that EFSA will publish a call for data to review **quinclorac** (Quinstar) MRLs in an upcoming mandate. This will be the second group of substances reviewed by the EU. This review will likely take place in 2026, parallel to the impact assessment. As quinclorac is no longer approved in the EU, it is likely the EU Commission will proceed with MRL changes, independent of the impact assessment results.

When EFSA publishes a request for data, the cranberry industry will have the opportunity to submit the residue study for quinclorac and request the maintenance of the EU MRL as an import tolerance. Quinclorac was not discussed at the SCoPAFF October 2025 meeting and is not on the agenda for discussion at the upcoming November 2025 meeting. BCI and the CI are watching this issue closely.

In June 2024, the European Commission established the cranberry MRL for **quinclorac** at 1.5 ppm, which is harmonized with the U.S., Canada, and Codex MRLs. **This remains a significant victory for the cranberry industry.** BCI will continue to monitor any developments and will inform the industry of any new updates.

Diazinon

In October 2025, the EU Commission maintained its proposal for **diazinon** (Diazinon) on cranberries at 0.01 ppm. Diazinon is not approved for use in the EU due to neurotoxic effects, unacceptable risks to human health, and high toxicity to birds, bees, and aquatic systems. Due to these effects, in December 2023, EFSA recommended lowering the MRL on cranberries to the undefined limit of quantification (LOQ). After additional review, EFSA concluded that diazinon MRLs were not supported and found it appropriate to lower the cranberry MRL to 0.01 ppm.

From the October 2025 draft, the EU Commission specified that **diazinon** MRLs lacked enough supporting toxicological reference values (TRVs), therefore, the risk assessment could not be finalized.

Difenoconazole

In June 2025, the European Commission published a draft proposal for **difenoconazole** (Quadris Top), in which the EU upheld the proposal of the cranberry MRL at 0.6 ppm. In October 2025, the EU Commission published a new draft proposal, in which the cranberry MRL was also upheld at 0.6 ppm. **This is great news for the industry.**

EU MRL Updates:

Since January 2025, the European Union has established **four** and proposed **two** MRLs on cranberries:

Established:

- **Acetamiprid** (Assail/Cormoran): established EU MRL (0.7 ppm) is less restrictive than the U.S. MRL (0.6 ppm).
- **Fenbuconazole** (Indar): established EU MRL (0.01 ppm) is more restrictive than the U.S. MRL (0.5 ppm).
- **Fosetyl-al** (Aliette): established EU MRL (1.5 ppm) is less restrictive than the U.S. MRL (0.5 ppm).
- **Napropamide** (Devrinol): established EU MRL (0.01 ppm) is more restrictive than the U.S. MRL (0.1 ppm).

Proposed:

- **Diazinon** (Diazinon): proposed EU MRL (0.01 ppm) is more restrictive than the U.S. MRL (0.5 ppm).

- **Difenoconazole** (Quadris Top): proposed EU MRL (0.6 ppm) is harmonized with the U.S., and Codex MRLs.

Canada MRL Updates

There are currently **59** cranberry MRLs with corresponding U.S. MRLs in Canada. Since January 2025, Canada has established **two** MRLs on cranberries:

Established:

- **Mefentrifluconazole** (Cevya): established Canadian MRL (2 ppm) is harmonized with the U.S. and Codex MRLs.
- **Spinosad** (Entrust/Success): established Canadian MRL (0.7 ppm) is less restrictive than the U.S. MRL (0.04 ppm).

Codex MRL Updates

BCI's Alinne Oliveira and Aya Stockton attended the 56th Codex Committee on Pesticide Residues (CCPR) meeting in Santiago, Chile, in September 2025. The Committee considered the MRL recommendations made by the FAO/WHO Joint Meeting on Pesticide Residues (JMPR) in 2024.

JMPR are the Codex scientists who evaluate data and make MRL recommendations. CCPR are the countries who review those recommendations and determine if they are acceptable for a permanent Codex MRL. BCI attends the CCPR to provide input and as part of the U.S. delegation.

JMPR reviewed **phosmet** (Imidan) as part of its 2024 periodic review. JMPR estimated and reaffirmed an MRL of 3 ppm for cranberries, while recommending the withdrawal of MRLs for most of the other commodities. Consequently, the cranberry MRL for **phosmet** will remain at 3 ppm. **This is good news for the cranberry industry.**

No other cranberry MRLs were discussed at this year's CCPR meeting, since JMPR did not propose any additional cranberry MRLs.

Future Reviews:

- **Bifenthrin** (Fanfare): cranberry MRL will be considered during the next CCPR meeting.
- **Fluopyram** (Luna Tranquility/Propulse): JMPR 2026/ CCPR 2027
- **Carbaryl** (Sevin): full review to be carried out in JMPR 2027 or later
- **Mancozeb** (Manzate): JMPR will review dithiocarbamates in three phases. The start review date has not been scheduled yet.

Japan MRL Updates

Japan maintains its own national MRL list, does not defer to other market standards, and applies a default MRL of 0.01 ppm. There are currently **72** cranberry MRLs that are established with corresponding U.S. MRLs in Japan. Since January 2025, Japan has established **two** and proposed **two** MRLs on cranberries:

Established:

- **Paraquat dichloride** (Gramoxone): established MRL (0.01 ppm) is more restrictive than the U.S. MRL (0.05 ppm) and the Canadian MRL (0.1 ppm) but is harmonized with the Codex MRL.

Pending:

- **Spirotetramat** (Movento): pending MRL (0.2 ppm) is more restrictive than the U.S. MRL (0.3 ppm) but is harmonized with the Codex MRL. The new MRL will come into effect on **April 23, 2026**. Until that date, the current MRL of 3 ppm applies.

Proposed:

- **Napropamide** (Devrinol): proposed revocation of the temporary MRL (0.1 ppm) to the default level of 0.01 ppm, which is more restrictive than the U.S. MRL (0.1 ppm).
- **Oryzalin** (Surflan): proposed revocation of the temporary MRL (0.1 ppm) to the default level of 0.01 ppm, which is more restrictive than the U.S. MRL (0.05 ppm).

Australia MRL Updates

For the past decade, the cranberry industry has successfully obtained many MRLs through Australia's FSANZ MRL harmonization request system. In the 2024 harmonization cycle, the cranberry industry submitted MRL requests for **five** active ingredients, including **buprofezin** (Courier) at 2.5 ppm, **carfentrazone-ethyl** (Aim) at 0.1 ppm, **cyprodinil** (Switch) at 6 ppm, **folpet** (Folpan) at 25 ppm, and **pendimethalin** (Satellite Hydrocap) at 0.1 ppm. These requests have not been announced yet. BCI continues to monitor for any developments.

Australia MRL Changes:

There are currently **86** cranberry MRLs established in Australia with corresponding U.S. MRLs. Since January 2025, Australia has established **two** MRLs on cranberries:

Established:

- **Broflanilide** (Brofreya): established MRL (0.002 ppm) is more restrictive than the U.S. MRL (0.01 ppm).
- **Fenazaquin** (Magister): established MRL (2 ppm) is harmonized with the U.S. and Codex MRLs.

USDA's ASCE Initiative

For the last year, USDA has undertaken multiple MRL projects under USDA's Assisting Specialty Crop Exports (ASCE) initiative. These have included MRL efforts in Japan, Korea, Taiwan, Southeast Asia, Latin America, Africa and at Codex. The project has also produced quick reference MRL sheets for commodities. BCI has been closely involved in the creation and guidance of these projects to ensure they benefit growers as much as possible to avoid MRL issues.

Specifically for the cranberry industry, through its grant, the ASCE APEC project will submit an import MRL application for **bifenthrin** (Fanfare) to Japan, saving the cranberry industry over 20 thousand dollars.

In June, Matt Lantz led an ASCE-sponsored delegation of specialty crop representatives and represented the cranberry industry in technical MRL meetings with the Japanese and Korean governments.

In May, Matt and Alinne also traveled to Taiwan to meet with Taiwan authorities to promote a more transparent and efficient import MRL system.

In Southeast Asia, the ASCE program is seeking to establish a regional system for seeking import tolerance MRLs. When a MRL is missing, such a system would allow for an application and then allow for MRLs to be established in multiple key export markets like Singapore, Malaysia, Thailand, Indonesia, the Philippines, and Vietnam. A pilot process was undertaken between USDA and the regional governments to see how a review might occur and what challenges might be identified. The ASCE program was looking for two candidates for the pilot program, and Matt was able to have two cranberry MRLs serve in that role. As a result, the first cranberry MRLs in the region will be established. There remains much to do before a system is codified, but the cranberry reviews were valuable and got the markets familiar with cranberries.

Priority Cranberry MRL Chart

BCI continues to update an MRL chart created for the cranberry industry, outlining the MRL activity of priority active ingredients in important markets. Updates include MRL developments, proposal or pending status, and probable next steps. In addition, an EU tab is included, which outlines priority active ingredient developments within the EU, including approval status, expiry dates, and probable next steps. Please contact Katie Ghantous or BCI for access or more information.