



Global Maximum Residue Limits (MRLs) and Contaminants Updates: 2025 Q4

A Quarterly Report Released by the American Pecan Council

A Practical Reference for Exporters, Shellers, Growers, Researchers, and Stakeholders to Protect the Pecan Export Trade

Report Highlights At-A-Glance

- 1. The EU has published several draft regulations on maximum residue levels (MRLs) of certain compounds:
 - Diazinon, fenarimol, chlorfenapyr, cyhexatin, dicofol, endosulfan, fenpropathrin, and profenofos Changed MRL for pecans: 0.01 mg/kg (Limit of Detection), from 0.02 mg/kg.
 - Difenoconazole Changed MRL for pecans lowered to 0.03 mg/kg, from 0.05 mg/kg.
 - Metribuzin, metribuzin-desamino-diketo (metribuzin-DADK) Changed MRL for pecans lowered to 0.01 mg/kg, from 0.1 mg/kg.
 - Alpha-cypermethrin and cypermethrin Proposed MRL for pecans at 0.015 mg/kg which is currently 0.05 mg/kg.
 - Copper Proposed MRL for copper in pecans has been raised to 40 mg/kg, from 30 mg/kg.
- 2. Based on the information provided by the American Pecan Council, the European trade group FRUCOM submitted a letter and dataset to the European Commission requesting that the maximum levels (MLs) for nickel in pecans be raised to 10 mg/kg from the current level of 3.5 mg/kg. The Commission has now proposed this to EU Member States and plans to include this proposal in an amendment to Regulation (EU) 2023/915. The most current update:
 - a. The level of Nickel will increase to 10ppm
 - b. This will be done via the so-called contaminants omnibus: a regulation which will include various amendments linked to several foodstuffs, not only concerning nickel/pecans
 - c. Publication in the Official Journal is expected in June-July
- 3. APC is now monitoring MRLs and Contaminants globally and will share this information in these quarterly reports. However, APC depends on the industry to provide feedback and input on how to make these reports more valuable. While APC cannot lobby for changes, it can educate export markets about the essential elements of pecan production and processing.



Purpose of This Report

As pecans expand into new export markets, there is a growing need to adapt to changing food regulations. In fact, there are numerous MRLs and contaminants proposed, revised, and changed each year. This report summarizes the potential changes to MRLs for pesticides and contaminant substances used in pecan production and processing across major export markets. It aims to help growers, processors, and exporters understand what's allowed in different countries, so they can make informed decisions about the use of certain growing and shelling inputs and how they affect export compliance.

Table of Contents:

MRLs	4
Contaminants	10
Special EU Update	23

Why do MRLs & Contaminants Matter?

As the pecan industry expands into new international markets, understanding and complying with maximum residue limits (MRLs) is becoming increasingly important.

- **Pesticides:** MRLs set the highest legally allowed levels of pesticide (or other agrochemical) residues in food, ensuring consumer safety and maintaining confidence in the quality of US pecans.
- **Contaminants:** In addition to pesticide residues, importing countries closely monitor other contaminants, such as heavy metals, mycotoxins, and environmental pollutants

Sources and Key Terms

This report is based on data from a global MRL and contaminant database called FoodChain ID and consultants APC hired to navigate the EU markets. Within this report, you will find various key terms:

- <u>Pending</u> entails an MRL that is approved but the effective date is in the future; the MRL is not yet in force.
- **Proposed** entails a draft MRL cited in a proposal, draft amendment, or petition that is still proceeding through the regulatory process. These include proposed new and revised



MRLs. These proposed actions are subject to change before being officially established in a regulation, or the proposals may be withdrawn.

• <u>Pending Revocation</u> means proposal, amendment, or petition to revoke the MRL is in the regulatory process. These proposed actions are subject to change or withdrawal.

The contaminants included in the report are pending expiration, pending revisions, or being proposed that may influence the pecan industry.

- <u>Pending Expiration</u> are contaminants that are in place, but the date of expiration is approaching.
- <u>Pending Revisions</u> to the contaminants are current contaminants that have revisions that are awaiting approval to change details on that contaminant substance.
- <u>Proposed</u> entails contaminants that have become relevant concern in a product and thresholds have been proposed to manage the contaminant.

What does this mean for Exporters?

As the US pecan industry continues to expand into international markets, exporters face increasing pressure to ensure shipments meet each country's MRL and contaminant requirements. Even when a pesticide program complies with US Environmental Protection Agency standards, the same residue levels may exceed limits in key export destinations such as the European Union, Canada, Japan, or South Korea. Noncompliance can result in rejected shipments, costly recalls, and long-term trade disruptions. To prevent these outcomes, exporters must work closely with growers and shellers to verify that pesticide and contaminant applications follow approved rates and preharvest intervals, and that proper documentation is maintained for traceability. Implementing residue testing programs before shipment can further safeguard market access and build buyer confidence. Consistent communication among growers, shellers, and exporters combined with the use of cultural management and integrated pest management strategies helps ensure that US pecans remain compliant, competitive, and trusted food source in global markets.

Take Action/ Recommendations

The American Pecan Council asks for your feedback on this report in order to modify to better serve the pecan industry. The goal is for this report to be a useful, educational resource to advance our industry and ensure high quality pecans reach successful export markets. Please let us know if there are any MRLs or Contaminants of concern to the industry, and we will research and provide updates to ensure American pecans can maintain in export markets.

• **For Exporters:** Exporters are encouraged to stay informed on new or changing MRLs through American Pecan Council reports and regulatory updates from EPA and Codex. The APC encourages exporters to provide feedback or any additional MRL and contaminant concerns to ensure we can build strong, trusted markets.



- For Shellers: Stay informed about international MRL and contaminant requirements to ensure that incoming lots meet the necessary residue standards for your target destinations. Work closely with growers and buyers to verify that pesticide use and preharvest intervals have been properly followed. Shellers also play a vital role in communicating observed residue concerns or regulatory updates back to growers and industry partners.
- For Growers: Review the reports that APC will be releasing with any changes or new MRLs and contaminants, and talk to your buyers to understand whether new regulations require changes in orchard management.
- For Researchers: Identify gaps in current research to address changing MRLs and contaminants through genetics and cultural management techniques. As well providing guidance to explore residue reduction strategies and provide supplemental education to extension agents on how growers can prevent and mitigate issues regarding MRLs and contaminants when producing pecans.

Pending and Proposed MRLs by Country

The charts in this section provide breakdown of pesticide MRLs that are currently being proposed or pending a revision. Currently, the European Union, Indonesia, and Japan have actively changing MRLs that may impact the pecan industry.

European Union

Market	Index Pesticide	Published Commodity Name	Index Commodity	MRL (ppm)	MRL Type	MRL State	MRL Effective Date
European Union	Metolachlor	Pecans	Nut, pecan	0.05	General	Current	Jul 06, 2014
European Union	Metolachlor	Pecans	Nut, pecan	0.01	General	Pending	Jan 06, 2026
European Union	S-metolachlor	Pecans	Nut, pecan	0.05	General	Current	Jul 06, 2014
European Union	S-metolachlor	Pecans	Nut, pecan	0.01	General	Pending	Jan 06, 2026
European Union	Thiamethoxam	Pecans	Nut, pecan	0.02	General	Current	Aug 26, 2016
European Union	Thiamethoxam	Pecans	Nut, pecan	0.01	General	Pending	Mar 07, 2026
European Union	Triflusulfuron- methyl	Pecans	Nut, pecan	0.02	General	Current	Sep 01, 2008
European Union	Triflusulfuron- methyl	Pecans	Nut, pecan	0.01	General	Pending	Jan 06, 2026



Indonesia

The MRL list for Indonesia is lengthy, but the majority of pesticides listed are already being tested for in other major export markets for pecans like the European Union. Please relay any concerns to APC.

Market	Index Pesticide	Published Commodity Name	Index Commodity	MRL (ppm)	MRL Type	MRL State	MRL Effective Date	Expiration Date
Indonesia	2,4-D	Nuts	Nut, pecan	0.2	General	Pending	Jun 20, 2026	
Indonesia	Abamectin	Nuts	Nut, pecan	0.005	General	Pending	Jun 20, 2026	
Indonesia	Acetamiprid	Nuts; Other	Nut, pecan	0.06	General	Pending	Jun 20, 2026	
Indonesia	Afidopyropen	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Alpha- Cypermethrin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Azinphos-methyl	Pecan	Nut, pecan	0.3	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Azoxystrobin	Nuts; Other	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Beta-cypermethrin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Bifenazate	Nuts	Nut, pecan	0.2	General	Pending	Jun 20, 2026	
Indonesia	Bifenthrin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Boscalid	Nuts; Other	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Buprofezin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Carbaryl	Nuts	Nut, pecan	1	General	Pending	Jun 20, 2026	
Indonesia	Carbendazim	Nuts	Nut, pecan	0.1	General	Pending	Jun 20, 2026	
Indonesia	Chlorantraniliprole	Nuts	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Chlorpyrifos	Pecan	Nut, pecan	0.05	General	Current	Jan 08, 2019	Jun 20, 2026

Indonesia	Clofentezine	Nuts	Nut, pecan	0.5	General	Pending	Jun 20, 2026	
Indonesia	Cyantraniliprole	Nuts	Nut, pecan	0.04	General	Pending	Jun 20, 2026	
Indonesia	Cyflumetofen	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Cyhalothrin	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Cypermethrin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Cyprodinil	Nuts, except almond and pistachio	Nut, pecan	0.04	General	Pending	Jun 20, 2026	
Indonesia	Difenoconazole	Nuts	Nut, pecan	0.03	General	Pending	Jun 20, 2026	
Indonesia	Diflubenzuron	Nuts	Nut, pecan	0.2	General	Pending	Jun 20, 2026	
Indonesia	Etoxazole	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Fenazaquin	Nuts	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Fenbuconazole	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Fenpropathrin	Nuts	Nut, pecan	0.15	General	Pending	Jun 20, 2026	
Indonesia	Fenpyroximate	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Flonicamid	Pecan	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Fluazifop-P-butyl	Pecan	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Flubendiamide	Nuts	Nut, pecan	0.1	General	Pending	Jun 20, 2026	
Indonesia	Fludioxonil	Nuts (except Pistachio)	Nut, pecan	0.3	General	Pending	Jun 20, 2026	
Indonesia	Fluensulfone	Nuts	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Fluindapyr	Nuts	Nut, pecan	0.04	General	Pending	Jun 20, 2026	

Indonesia	Flumioxazin	Nuts	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Fluopyram	Nuts	Nut, pecan	0.04	General	Pending	Jun 20, 2026	
Indonesia	Flupyradifurone	Pecan	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Fluxapyroxad	Nuts	Nut, pecan	0.04	General	Pending	Jun 20, 2026	
Indonesia	Fosetyl-Al	Nuts	Nut, pecan	400	General	Pending	Jun 20, 2026	
Indonesia	Glufosinate- ammonium	Nuts	Nut, pecan	0.1	General	Pending	Jun 20, 2026	
Indonesia	Hexythiazox	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Imidacloprid	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Indoxacarb	Nuts	Nut, pecan	0.07	General	Pending	Jun 20, 2026	
Indonesia	Kresoxim-methyl	Pecan	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Lambda Cyhalothrin	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Mancozeb	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Maneb	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Mefentrifluconazole	Nuts	Nut, pecan	0.06	General	Pending	Jun 20, 2026	
Indonesia	Mesotrione	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Metconazole	Nuts	Nut, pecan	0.04	General	Pending	Jun 20, 2026	
Indonesia	Methidathion	Pecan	Nut, pecan	0.05	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Methoxyfenozide	Nuts	Nut, pecan	0.1	General	Pending	Jun 20, 2026	
Indonesia	Methyl bromide	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	

T 1 .	3.5.7	D.	3.T. /	0.1	G 1	C .	T 00	1 20
Indonesia	Metiram	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Paraquat dichloride	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Pendimethalin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Penthiopyrad	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Phosmet	Nuts	Nut, pecan	0.2	General	Pending	Jun 20, 2026	
Indonesia	Phosphine	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Propineb	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Pydiflumetofen	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Pyraclostrobin	Nuts (except Pistachio)	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Pyrethrins	Nuts	Nut, pecan	0.5	General	Pending	Jun 20, 2026	
Indonesia	Saflufenacil	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Spinetoram	Nuts	Nut, pecan	0.01	General	Pending	Jun 20, 2026	
Indonesia	Spinosad	Nuts	Nut, pecan	0.07	General	Pending	Jun 20, 2026	
Indonesia	Spirodiclofen	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Spirotetramat	Nuts	Nut, pecan	0.5	General	Pending	Jun 20, 2026	
Indonesia	Sulfoxaflor	Nuts	Nut, pecan	0.03	General	Pending	Jun 20, 2026	
Indonesia	Sulfuryl fluoride	Nuts	Nut, pecan	3	General	Pending	Jun 20, 2026	
Indonesia	Tebuconazole	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Tetraniliprole	Nuts; Other	Nut, pecan	0.03	General	Pending	Jun 20, 2026	

Indonesia	Thiacloprid	Nuts	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Thiram	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Trifloxystrobin	Nuts	Nut, pecan	0.02	General	Pending	Jun 20, 2026	
Indonesia	Zeta-Cypermethrin	Nuts	Nut, pecan	0.05	General	Pending	Jun 20, 2026	
Indonesia	Zineb	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026
Indonesia	Ziram	Pecan	Nut, pecan	0.1	General	Current	Jan 08, 2019	Jun 20, 2026

<u>Japan</u>

Market	Index Pesticide	Published Commodity Name	Index Commodity	MRL (ppm)	MRL Type	MRL State	MRL Effective Date
Japan	Fluopyram	Pecan	Nut, pecan	0.05	General	Current	Jul 02, 2013
Japan	Fluopyram	Pecan	Nut, pecan	0.04	General	Pending	Feb 27, 2026

Canada- No current or pending MRL changes.

United States- No current or pending MRL changes.

Mexico- No current or pending MRL changes.

Australia-No current or pending MRL changes.

South Africa- No current or pending MRL changes.

China-No current or pending MRL changes.

9



Pending and Proposed Contaminants by Country

The charts in this section provide breakdown of contaminants that are currently being proposed or pending a revision. Currently, the European Union and Turkey have contaminants that are pending expirations, pending revisions, and new proposals that may impact the pecan industry.

European Union

Market	Contaminant	Food Category	Commodity	Maximum Level (ppm)	State	Regulation Effective Date	Regulatory Notes
European Union	Nickel	Nuts and seeds	3.6.1.1 Tree nuts except products listed in 3.6.1.2	3.5	Current	7/1/2025	The maximum level applies to the edible part. The maximum level does not apply to tree nuts for crushing and oil refining, provided that the remaining pressed tree nuts are not placed on the market as food. In case the remaining pressed tree nuts are placed on the market as food, the maximum level applies, taking into account Article 3(1) and (2). Fruits, tree nuts, vegetables, cereals, oilseeds, herbs and spices as listed in the relevant category as defined in Annex I to Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC (OJ L 70, 16.3.2005, p. 1). Tree nuts are not covered by the maximum level for fruit.

	1	1				T
European Union	Nickel	Nuts and seeds	3.6.1.2 Chestnuts, pine nuts, walnuts, Brazil nuts, cashew nuts and pecan nuts	10	Proposed	The maximum level applies to the edible part. The maximum level does not apply to tree nuts for crushing and oil refining, provided that the remaining pressed tree nuts are not placed on the market as food. In case the remaining pressed tree nuts are placed on the market as food, the maximum level applies, taking into account Article 3(1) and (2). Fruits, tree nuts, vegetables, cereals, oilseeds, herbs and spices as listed in the relevant category as defined in Annex I to Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC (OJ L 70, 16.3.2005, p. 1). Tree nuts are not covered by the maximum level for fruit.

	371 1 1	37. 4	2 6 10 2	1.0	D 11	5/1/2026	m
European Union	Nickel	Nuts and seeds	3.6.10.2 Oilseeds: Peanuts	12	Pending	7/1/2026	The maximum level does not apply to oilseeds for crushing and oil refining, provided that the remaining pressed oilseeds are not placed on the market as food. In case the remaining pressed oilseeds are placed on the market as food, the maximum level applies, taking into account Article 3(1) and (2). Fruits, tree nuts, vegetables, cereals, oilseeds, herbs and spices as listed in the relevant category as defined in Annex I to Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC (OJ L 70, 16.3.2005, p. 1). Tree nuts are not covered by the maximum level for fruit.



Turkey

Turkey	Aflatoxin B1	Nuts and	1.1.4 Peanuts	0.008	Current	11/5/2023	Except for peanuts
		Seeds	and other				and other oilseeds
			oilseeds: To				used in the
			be subjected				production of refined
			to sorting or				vegetable oil. If
			other physical				peanuts and other
			treatment				oilseeds are analyzed
			before				with their shells, it is
			placing on the				assumed that the
			market for the				contamination is
			final				entirely in the edible
			consumer or				portion when
			use as an				calculating the
			ingredient in				aflatoxin amount. For
			food				fruits, tree nuts,
							vegetables, cereals,
							oilseeds and spices,
							reference is made to
							the foods listed in the
							relevant category
							defined in Annex 1 of
							the Turkish Food
							Codex, Maximum
							Pesticide Residue
							Limits Regulation.
							The maximum limits
							set for fruits do not
							include tree nuts.
1	1		ı		i	I	

Turkey Aflatoxin Bl Nuts and Seeds oilseeds (so only ingredient) and their processed products: Those placed on the market for the final consumer or use as an ingredient in food food Aflatoxin Bl Nuts and Seeds Only ingredient in food Current 12/31/2024 Except for crude vegetable oil to be refined and refined vegetable toil. If peanuts and other oilseeds are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other collseeds. In other cases, the maximum limits are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products containing the dibel portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of Article 6 of this of the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of the shard shell fruits. In other cases, the maximum limit are applied in accordance with the			3.7	11.50.	0.00-		10/01/02:	
only ingredient) and their processed products: Those placed on the market for the final consumer or use as an ingredient in food This maximum limit also applies to foods containing of at least 80% of these analyzed with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell fruits as assumed that the contamination is entirely in the edible portion when calculating the affatoxin amount. This maximum limit are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the affatoxin amount. This maximum limit are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the affatoxin amount. This maximum limit also applies to foods containing pands held fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits are applied in in other cases, the maximum limits are applied in in the cases, the maximum limits are applied in in the cases, the maximum limits are applied in in the cases, the maximum limits are applied in the contamination is entirely in the edible portion when calculating the affatoxin amount.	Turkey	Aflatoxin B1	Nuts and	1.1.5 Other	0.002	Current	12/31/2024	Except for crude
ingredienty and their processed products: Those placed on the market for the final consumer or use as an ingredient in food This maximum limit also applies to foods containing peanuts and other oilseeds. In other cases, the maximum limit are applied in accordance with their skeen, and their oilseeds. In other cases, the maximum limit are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the maximum limits are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing the aflatoxin amount. This maximum limit also applies to foods containing the aflatoxin amount. This maximum limit also applies to foods containing hard shell fittits as a single ingredient or processed products consisting of at least 80% of these hard shell firtits. In other cases, the maximum limits are applied in other cases, the maximum limit is as a single ingredient or processed products consisting of at least 80% of these hard shell firtits. In other cases, the maximum limits are applied in other cases, the maximum limits are applied in other cases, the maximum limits are applied in the contamination is entirely in the edible portion when calculating the aflatox in a contamination is entirely in the edible portion when calculating the aflatox in a contamination is entirely in the edible portion when calculating the aflatox in a contamination is entirely in the edible portion when calculating the aflatox in a contamination is entirely in the edible portion when calculating the aflatox in a contamination is entirely in the edible portion when calculating the aflatox in a contamination is entirel			Seeds	`				
and their processed products: Those placed on the market for the final consumer or use as an ingredient in food This maximum limit also applies to foods a single ingredient or processed products consisting of at least Regulation. If hard shell, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in limits are applied in								
processed products: Those placed on the market for the final consumer or use as an ingredient in food								
products: Those placed on the market for the final consumer or use as an ingredient in food a ingredient in food								
Those placed on the market for the final consumer or use as an ingredient in food Todd T								
on the market for the final consumer or use as an ingredient in food fo								
for the final consumer or use as an ingredient in food food								
consumer or use as an ingredient in food								
use as an ingredient in food food food food food food first maximum limit also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in foreign and shell fruits. In other cases, the maximum limits are applied in lates and a limit also applied in lates are applied in lates and a lates are applied in lates are applied								
ingredient in food food aflatoxin amount. This maximum limit also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
food This maximum limit also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are asplied in limits are applied in								
also applies to foods containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in limits are applied in								
containing peanuts and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in other cases, the maximum limits are applied in				food				
and other oilseeds as a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
a single ingredient or processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
processed products consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
consisting of at least 80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
80% peanuts and other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell ffruits. In other cases, the maximum limits are applied in								
other oilseeds. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
with the first, second, and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
and third paragraphs of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
of Article 6 of this Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
Regulation. If hard shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
shell nuts are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
that the contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
contamination is entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
entirely in the edible portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
portion when calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
calculating the aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
aflatoxin amount. This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
This maximum limit also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
also applies to foods containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
containing hard shell fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
fruits as a single ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
ingredient or processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
processed products consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
consisting of at least 80% of these hard shell fruits. In other cases, the maximum limits are applied in								
80% of these hard shell fruits. In other cases, the maximum limits are applied in								
shell fruits. In other cases, the maximum limits are applied in								
cases, the maximum limits are applied in								
limits are applied in								
first, second, and								
third paragraphs of								
Article 6 of this								
Regulation. If hard								
shell fruits are								
analyzed with their								analyzed with their

			shells, it is assumed
			that the
			contamination is
			entirely in the edible
			portion when
			calculating the
			aflatoxin amount.
			This maximum limit
			also applies to foods
			containing almonds,
			pistachios and apricot
			kernels as e
			ingredient or
			processed products
			consisting of at least
			80% of these hard
			shell fruits. In other
			cases, the maximum
			limits are applied in
			accordance with the
			first, second, and
			third paragraphs of
			Article 6 of this
			Regulation. For fruits,
			tree nuts, vegetables,
			cereals, oilseeds and
			spices, reference is
			made to the foods
			listed in the relevant
			category defined in
			Annex 1 of the
			Turkish Food Codex,
			Maximum Pesticide
			Residue Limits
			Regulation. The
			maximum limits set
			for fruits do not
			include tree nuts.

T1	A.Cl. 4	NT4	11CT	0.005	C	10/21/2024	IC4
Turkey	Aflatoxin B1	Nuts and	1.1.6 Tree nuts	0.005	Current	12/31/2024	If tree nuts 'in shell' are
		Seeds	(except those				analyzed, it is assumed,
			listed in points				when calculating the
			1.1.8 and				aflatoxin content, that
			1.1.0): To be				all the contamination is
			subjected to				on the edible part. For
			sorting or				fruits, tree nuts,
			other physical				vegetables, cereals,
			treatment				oilseeds and spices,
			before placing				reference is made to the
			on the market				foods listed in the
			for the final				relevant category
			consumer or				defined in Annex 1 of
			use as an				the Turkish Food
			ingredient in				Codex, Maximum
			food				Pesticide Residue
							Limits Regulation. The
							maximum limits set for
							fruits do not include
							tree nuts.

Turkey	Aflatoxin B1	Nuts and	1.1.7 Tree nuts	0.005	Current	11/5/2023	From December 31, 2025:
		Seeds	(used as only				2.0 μg/kg.
			ingredient)				If tree nuts 'in shell' are
			and their				analyzed, it is assumed,
			processed				when calculating the
			products				aflatoxin content, that all the
			(except those				contamination is on the
			listed in points				edible part.
			1.1.9 and				In the case of food
			1.1.11): Those				consisting of tree nuts used
			placed on the				as only ingredient or in the
			market for the				case of processed products
			final consumer				consisting at least of 80 %
			or use as an				from the tree nuts
			ingredient in				concerned, the maximum
			food				levels as established for tree
							nuts apply also to those
							products. In other cases,
							maximum limits are applied,
							taking into account the first,
							second and third paragraphs
							of Article 6 of this
							regulation. For fruits, tree
							nuts, vegetables, cereals,
							oilseeds and spices,
							reference is made to the
							foods listed in the relevant
							category defined in Annex 1
							of the Turkish Food Codex,
							Maximum Pesticide Residue
							Limits Regulation. The
							maximum limits set for
							fruits do not include tree
							nuts.

Turkey	Aflatoxin B1	Nuts and	1.1.7 Tree	0.002	Pending	12/31/25	If tree nuts 'in shell' are
Turkey	Anatoxiii Di	Seeds	nuts (used as	0.002	1 chang	12/31/23	analyzed, it is assumed, when
		Seeds	only				calculating the aflatoxin content,
			ingredient)				that all the contamination is on
			and their				the edible part.
			processed				the edible part.
			_				In the case of food consisting of
			products				
			(except those				tree nuts used as only ingredient
			listed in				or in the case of processed
			points 1.1.9				products consisting at least of 80
			and 1.1.11):				% from the tree nuts concerned,
			Those placed				the maximum levels as
			on the market				established for tree nuts apply
			for the final				also to those products. In other
			consumer or				cases, maximum limits are
			use as an				applied, taking into account the
			ingredient in				first, second and third paragraphs
			food				of Article 6 of this regulation.
							For fruits, tree nuts, vegetables,
							cereals, oilseeds and spices,
							reference is made to the foods
							listed in the relevant category
							defined in Annex 1 of the
							Turkish Food Codex, Maximum
							Pesticide Residue Limits
							Regulation. The maximum limits
							set for fruits do not include tree
							nuts.
I	1	ĺ	I	1			

Turkey	Aflatoxins,	Nuts and	1.1.4	0.015	Current	11/5/2023	Except for peanuts and other oilseeds
Turkey	Atlatoxins, total	Nuts and Seeds	Peanuts and other oilseeds: To be subjected to sorting or other physical treatment before placing on the market for the final consumer or use as an ingredient in food	0.015	Current	11/5/2023	except for peanuts and other oilseeds used in the production of refined vegetable oil. If peanuts and other oilseeds are analyzed with their shells, it is assumed that the contamination is entirely in the edible portion when calculating the aflatoxin amount. For fruits, tree nuts, vegetables, cereals, oilseeds and spices, reference is made to the foods listed in the relevant category defined in Annex 1 of the Turkish Food Codex, Maximum Pesticide Residue Limits Regulation. The maximum limits set for fruits do not include tree nuts.

	. ~ .		44.501	0.004	_ ~	10/01/0:	
Turkey	Aflatoxins,	Nuts and	1.1.5 Other	0.004	Current	12/31/24	Except for crude vegetable oil to be refined
	total	Seeds	oilseeds (as				and refined vegetable oil. If peanuts and
			only				other oilseeds are analyzed with their
			ingredient)				shells, it is assumed that the contamination
			and their				is entirely in the edible portion when
			processed				calculating the aflatoxin amount. This
			products:				maximum limit also applies to foods
			Those placed				containing peanuts and other oilseeds as a
			on the				single ingredient or processed products
			market for				consisting of at least 80% peanuts and
			the final				other oilseeds. In other cases, the
			consumer or				maximum limits are applied in accordance
			use as an				with the first, second, and third paragraphs
			ingredient in				of Article 6 of this Regulation. If hard shell
			food				nuts are analyzed with their shells, it is
							assumed that the contamination is entirely
							in the edible portion when calculating the
							aflatoxin amount. This maximum limit
							also applies to foods containing hard shell
							fruits as a single ingredient or processed
							products consisting of at least 80% of these
							hard shell fruits. In other cases, the
							maximum limits are applied in accordance
							with the first, second, and third paragraphs
							of Article 6 of this Regulation. If hard shell
							fruits are analyzed with their shells, it is
							assumed that the contamination is entirely
							in the edible portion when calculating the

19

							aflatoxin amount. This maximum limit also applies to foods containing almonds, pistachios and apricot kernels as e ingredient or processed products consisting of at least 80% of these hard-shell fruits. In other cases, the maximum limits are applied in accordance with the first, second, and third paragraphs of Article 6 of this Regulation. For fruits, tree nuts, vegetables, cereals, oilseeds and spices, reference is made to the foods listed in the relevant category defined in Annex 1 of the Turkish Food Codex, Maximum Pesticide Residue Limits Regulation. The maximum limits set for fruits do not include tree nuts.
Turkey	Aflatoxins, total	Nuts and Seeds	1.1.6 Tree nuts (except those listed in points 1.1.8 and 1.1.0): To be subjected to sorting or other physical treatment before placing on the market for the final consumer or use as an ingredient in food	0.01	Current	12/31/24	If tree nuts 'in shell' are analyzed, it is assumed, when calculating the aflatoxin content, that all the contamination is on the edible part. For fruits, tree nuts, vegetables, cereals, oilseeds and spices, reference is made to the foods listed in the relevant category defined in Annex 1 of the Turkish Food Codex, Maximum Pesticide Residue Limits Regulation. The maximum limits set for fruits do not include tree nuts.

20

Turkey	Aflatoxins,	Nuts and	1.1.7 Tree	0.01	Current	11/5/23	From December 31, 2025: 4.0 μg/kg.
	total	Seeds	nuts (used				If tree nuts 'in shell' are analyzed, it is
			as only ingredient)				assumed, when calculating the aflatoxin content, that all the contamination is on the
			and their				edible part.
			processed				ranna Faan
			products				In the case of food consisting of tree nuts
			(except				used as only ingredient or in the case of
			those listed				processed products consisting at least of 80
			in points				% from the tree nuts concerned, the
			1.1.9 and 1.1.11):				maximum levels as established for tree nuts apply also to those products. In other
			Those				cases, maximum limits are applied, taking
			placed on				into account the first, second and third
			the market				paragraphs of Article 6 of this regulation.
			for the final				For fruits, tree nuts, vegetables, cereals,
			consumer or				oilseeds and spices, reference is made to
			use as an				the foods listed in the relevant category
			ingredient in food				defined in Annex 1 of the Turkish Food Codex, Maximum Pesticide Residue
			1000				Limits Regulation. The maximum limits
							set for fruits do not include tree nuts.
Turkey	Aflatoxins,	Nuts and	1.1.7 Tree	0.004	Pending	12/31/25	If tree nuts 'in shell' are analyzed, it is
	total	Seeds	nuts (used as only				assumed, when calculating the aflatoxin content, that all the contamination is on the
			ingredient)				edible part.
			and their				In the case of food consisting of tree nuts
			processed				used as only ingredient or in the case of
			products				processed products consisting at least of 80
			(except				% from the tree nuts concerned, the
			those listed				maximum levels as established for tree
			in points 1.1.9 and				nuts apply also to those products. In other cases, maximum limits are applied, taking
			1.1.9 and 1.1.11):				into account the first, second and third
			Those				paragraphs of Article 6 of this regulation.
			placed on				For fruits, tree nuts, vegetables, cereals,
			the market				oilseeds and spices, reference is made to
			for the final				the foods listed in the relevant category
			consumer or				defined in Annex 1 of the Turkish Food
			use as an				Codex, Maximum Pesticide Residue
			ingredient in food				Limits Regulation. The maximum limits set for fruits do not include tree nuts.
			1004				set for francia do not merade tree flats.

Turkey	Ochratoxin	Nuts and	1.2.11.3	0.003	Current	12/31/2024	For fruits, tree nuts, vegetables, cereals,
1 411103	A	Seeds	Bakery	0.002		12/01/2021	oilseeds and spices, reference is made to
			wares,				the foods listed in the relevant category
			cereal				defined in Annex 1 of the Turkish Food
			snacks and				Codex, Maximum Pesticide Residue
			breakfast				Limits Regulation. The maximum limits
			cereals:				set for fruits do not include tree nuts.
			other				For fruits, tree nuts, vegetables, cereals,
			products				oilseeds and spices, reference is made to
			containing				the foods listed in the relevant category
			oilseeds,				defined in Annex 1 of the Turkish Food
			nuts and/or				Codex, Maximum Pesticide Residue
			dried fruit				Limits Regulation. The maximum limits
							set for fruits do not include tree nuts.

Canada- No current or pending contaminant changes.

<u>United States</u>- No current or pending contaminant changes.

Mexico- No current or pending contaminant changes.

Australia- No current or pending contaminant changes.

South Africa-No current or pending contaminant changes.

China- No current or pending contaminant changes.



European Union Specific Updates

APC contracts with Joint Secretariat of Agricultural Trade Association (SACAR) to provide pecan-specific updates on the EU market.

Update on EU Tariffs/Trade Deal

On 28 August, the European Commission made a proposal for tariff liberalisation and market access for products form the United States as part of a deal reached in Scotland during July 2025 between the US President Trump and the European Commission President von der Leyen. The proposal is now going through the legislative process in the European Parliament and in the Council (EU body for the 27 Member States).

On 3 November, the European Parliament's international trade committee (INTA), which is responsible for steering this legislation in the Parliament, held a hearing on this proposal. Participants discussed a draft report by the INTA Committee's Chair, Bernd Lange. He is also responsible as the lead reporter to the Parliament on the legislative progress of the proposal.

The Lange report has five priorities for amending the Commission's proposal, namely that the proposal should include: 1- steel, 2- a standstill clause, 3- a suspension clause, 4- a safeguard clause, and 5- a sunset clause. The safeguard clause will involve the ability for the EU to immediately suspend market access in case of coercive measures or policy changes by the US. Mr. Lange argues that the current proposal is not WTO compatible so there should be an 18-month sunset clause which would suspend market access if the proposal fails to become WTO compatible within this period. Both the members of the INTA Committee and a representative from the Committee for Agriculture (AGRI) and Budget were broadly supportive of Mr. Lange's report.

There will be another exchange in the INTA Committee in December, where compromise amendments will likely be reached. A vote on the amended proposal in the INTA Committee could be taken at the end of January 2026. A final vote in the European Parliament, following inter-institutional discussions with the Council, could be expected in March or April 2026. This means that the earliest that the proposal could enter into force would be spring 2026.

A European Council meeting on 16 October 2025 discussed bilateral/regional issues and trade negotiations, including on the import duties on US goods. The position of the Council could be similar to that proposed in the draft report by Mr. Lange in relation to safeguards and suspension.

More recently, on 28 October, FRUCOM had an exchange with the European Commission's DG AGRI to discuss the Commission's options to address industry concerns about the Commission's 500,000 metric ton tariff rate quota (TRQ) for US origin nuts (processed and unprocessed), which is included in the Commission's proposal on market access for US products. DG AGRI explained that the first point is to understand whether the text of the Commission's proposal foresees legislation for this outcome. If the Commission's proposal does not include a clause to adopt legislation on this area, the first step is for the industry to present a request for such legislation to be adopted by the Commission.



Finally, FRUCOM will present the latest EU-US trade developments during the Hamburg meeting on November 20th. This will include discussing actions on the Commission's proposal on market access for US products, and the details on the management and definition of the 500,000 metric ton TRQ for nuts from the US.

NICKEL MAXIMUM LEVELS: COMMISSION PROPOSAL TO RAISE MAXIMUM LEVEL – STATE OF PLAY

In August 2025, FRUCOM submitted a letter and dataset to the European Commission requesting maximum levels (MLs) of nickel in pecans to be raised to 10 mg/kg. Under Regulation (EU) 2024/1987, the ML allowed in pecans had been set at 3.5 mg/kg.

FRUCOM's dataset contained significant exceedances of the ML in the Regulation on 95% of the datapoints. The requested ML of 10 mg/kg is also in line with the level of many tree nuts with a similar composition to pecans, including cashew nuts, Brazil nuts, and walnuts, under the applicable Regulation. The Commission also informed FRUCOM that the level had been derived from just one data point, highlighting the lack of data for this particular case.

Following FRUCOM's letter, on September 19 during a Standing Committee meeting the Commission proposed to EU Member States that the ML be raised to 10 mg/kg. The Commission confirmed to us that none of the Member States has commented against it so far.

The Commission plans to include this proposal in an amendment to Regulation (EU) 2023/915, which will address several contaminants and products. It is foreseen to be voted in late 2025/early 2026, and published as legislation in April/May 2026.

MAXIMUM RESIDUE LEVELS UPDATE

EU PUBLISHED DRAFT MRLS for DIAZINON, FENARIMOL AND PROFENOFOS

The EU has published a draft Regulation amending Annexes II, III and V to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels (MRLs) for diazinon, fenarimol, chlorfenapyr, cyhexatin, dicofol, endosulfan, fenpropathrin and profenofos in or on certain products, including pecans. The MRLs for pecans will be lowered from 0.02 mg/kg to 0.01 mg/kg (the limit of detection, LOD). The draft and annex are available at:

https://ec.europa.eu/transparency/comitology-register/core/api/integration/ers/493167/110097/1/attachment

https://ec.europa.eu/transparency/comitology-register/core/api/integration/ers/493163/110097/1/attachment



EU PUBLISHES DRAFT MRLS FOR COPPER, DIFENOCONAZOLE, METRIBUZIN, ALPHA-CYPERMETHRIN AND CYPERMETHRIN

The EU has published a draft Commission Regulation (EU) amending Annexes II and III to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels for copper compounds in or on certain products.

Under the draft Regulation, the proposed new MRL for copper in pecans has been raised to 40 mg/kg, from 30 mg/kg. All information is available at:

https://ec.europa.eu/transparency/comitology-register/screen/documents/108179/2

The EU has published a draft Commission Regulation (EU) amending Annex II and III to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels for difenoconazole in or on certain products.

Under the draft Regulation, the proposed new MRL for difenoconazole in pecans has been lowered to 0.03 mg/kg, from 0.05 mg/kg. All information is available at: https://ec.europa.eu/transparency/comitology-register/screen/documents/105282/3

The EU has published a draft Commission Regulation (EU) amending Annexes II, III and V to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels for metribuzin, metribuzin-desamino-diketo (metribuzin-DADK), and other substances, in or on certain products.

Under the draft Regulation, the proposed new MRL for metribuzin, metribuzin-desamino-diketo (metribuzin-DADK) in pecans has been lowered to 0.01 mg/kg, from 0.1 mg/kg. All information is available at: https://ec.europa.eu/transparency/comitology-register/screen/documents/108180/2

The EU has published a draft Commission Regulation (EU) amending Annexes II and III to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels for alpha-cypermethrin and cypermethrin in or on certain products.

This draft Regulation proposes to set MRLs for alpha-cypermethrin, which are currently not in place under the applicable Regulation. The proposed MRL is 0.015 mg/kg. All information is available at: https://ec.europa.eu/transparency/comitology-register/screen/documents/108181/2

Disclaimer: We issue reports to inform APC of ongoing regulatory developments at EU level. Every effort is made to ensure that the information provided is accurate and up to date. If errors, omissions, or misleading statements are brought to our attention, we will try to correct them. However, we accept no legal responsibility or liability whatsoever with regard to the information provided in this report and use made thereof.

Copyright: This report is addressed solely to APC and, where appropriate, its member companies. It must not be further disseminated. If the reader is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this circular or its attachment(s) is strictly prohibited.