Citrus Growers' Association
OF SOUTHERN AFRICA

Citrus Sustainability Forum

09 May 2025

Agenda

- Welcome
  - Apologies
  - Finalization of the agenda
  - Approval of the previous minutes (28 February 2024)
- Demystifying Carbon Credits: A Game Changer or just Hot Air? – Pieter van Niekerk (Anthesis)
- Carbon and Beyond: Looking at the bigger picture – Alistair Galloway (Brightwolves)
- Other matters
  - EU environmental/sustainability regulatory update
  - MRL update
  - Pest Control Operator (PCO) Regulation
  - Crop Life SA 2025 webinars
- Date of next meeting
- Close

Citrus Growers' Association OF SOUTHERN AFRICA

Welcome

- Apologies
  - Christo Theron
  - Wilma du Plooy
  - MC Pretorius
  - Trienie Kellerman
  - Nico Smith
- Finalization of the agenda
- Approval of the previous minutes (28 February 2024)

Citrus Growers' Association
OF SOUTHERN AFRICA

Demystifying carbon credits: A game-changer or just hot air?

Pieter van Niekerk

Principal Sales Manager – AgriCarbon (Anthesis South Africa)

09 May 2025

AgriCarbon
Part of Anthesis

Citrus Sustainability Forum

Contents

At Anthesis, we use our decades of combined experience to develop and deliver credible climate projects for businesses and organisations.

Following globally reputable monitoring, reporting, and verification (MRV) frameworks to provide high-quality carbon offsets.

We help the world's leading organisations to get offsetting right.

We utilise 20+ years of carbon finance expertise to avoid reputational risks and to ensure our global clients feel confident when considering carbon offsets.

AgriCarbon
Part of Anthesis

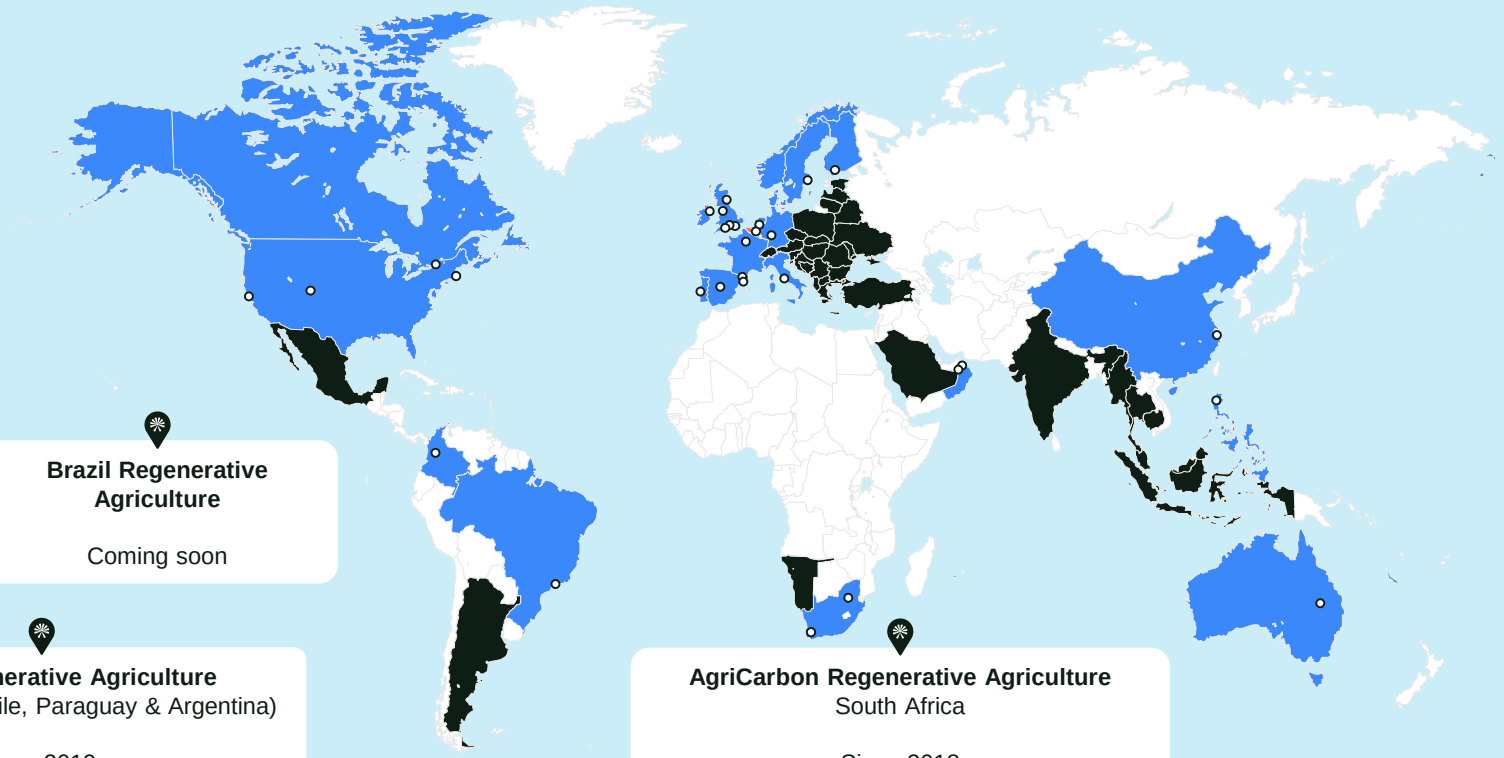
Anthesis Regenerative Agriculture Carbon Projects

1300+ EXPERTS

44 OFFICES

23 COUNTRIES

- Locations
- Consultants
- Sub consultants



Brazil Regenerative Agriculture

Coming soon

SARA Regenerative Agriculture
South America (Chile, Paraguay & Argentina)

Since 2019

AgriCarbon Regenerative Agriculture
South Africa

Since 2018

Journeys we've navigated with many of the world's most iconic businesses and brands.

SA Climate Policy Landscape

South Africa's GHG Emissions

South Africa is the 16th largest emitter of GHGs in the world:

- In 2020, SA emitted 447.36 million tCO2e
- Due to abundant coal reserves and relative isolation in its recent history it has one of the most carbon intensive energy systems in the world (1,56tCO2e/million $GDP)

South Africa's GHG Mitigation Policy Landscape

South Africa deploys a wide range of policy instruments to mitigate GHGs emissions:

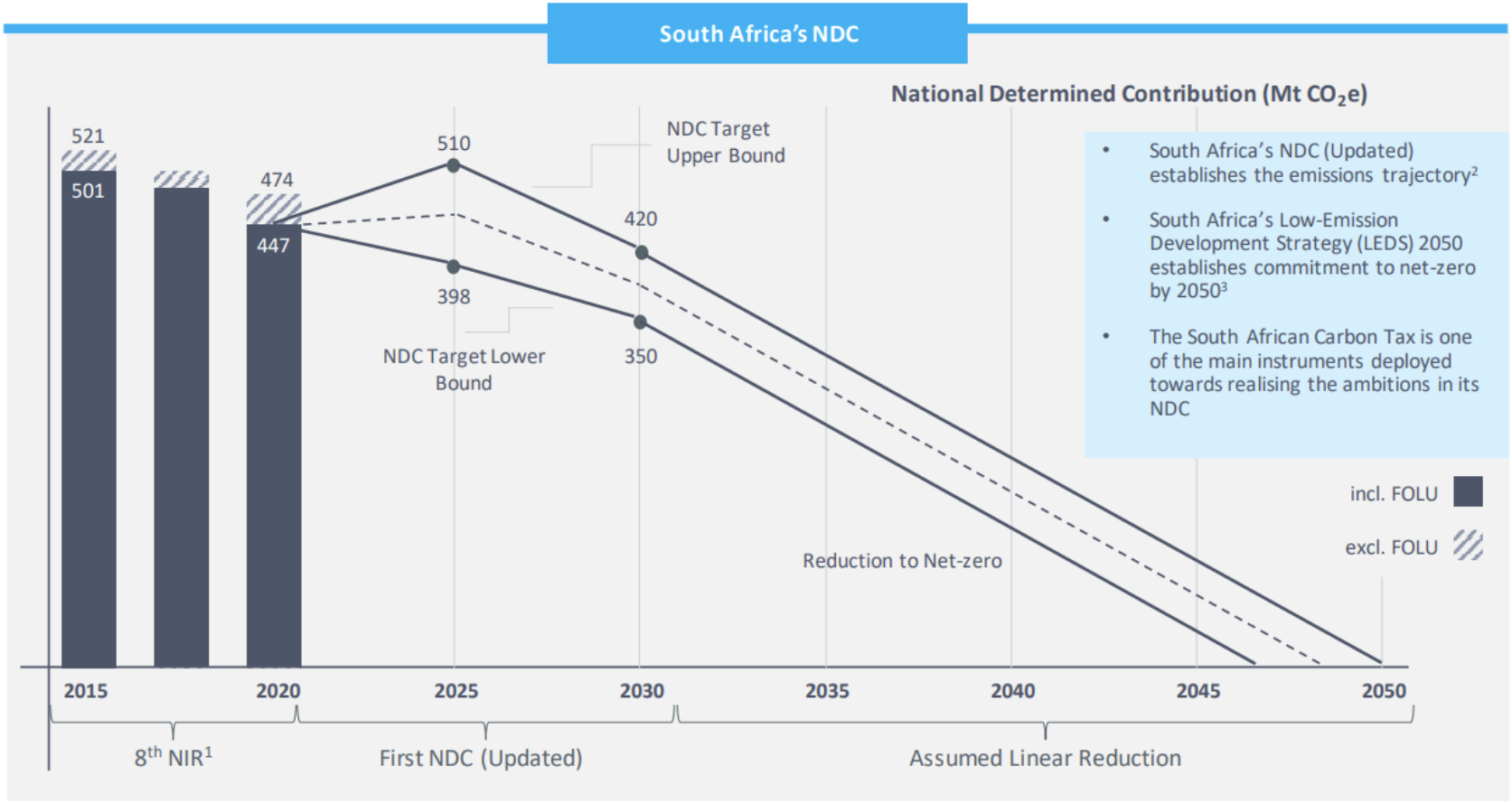
- SA is an active participant in the COP process and has ratified the Kyoto Protocol and Paris Agreement
- SA has introduced cost instruments (**Carbon Tax, Carbon Budgets**), incentive structures (REIPPP, 12 L EE) and recent CC Bill

South Africa's Carbon Market

South Africa has a voluntary and compliance carbon market:

- Voluntary: local or international carbon credits used by local companies for marketing or net zero purposes
- Compliance: companies liable for carbon tax can use certain local carbon offsets to pay less tax

South Africa's NDC

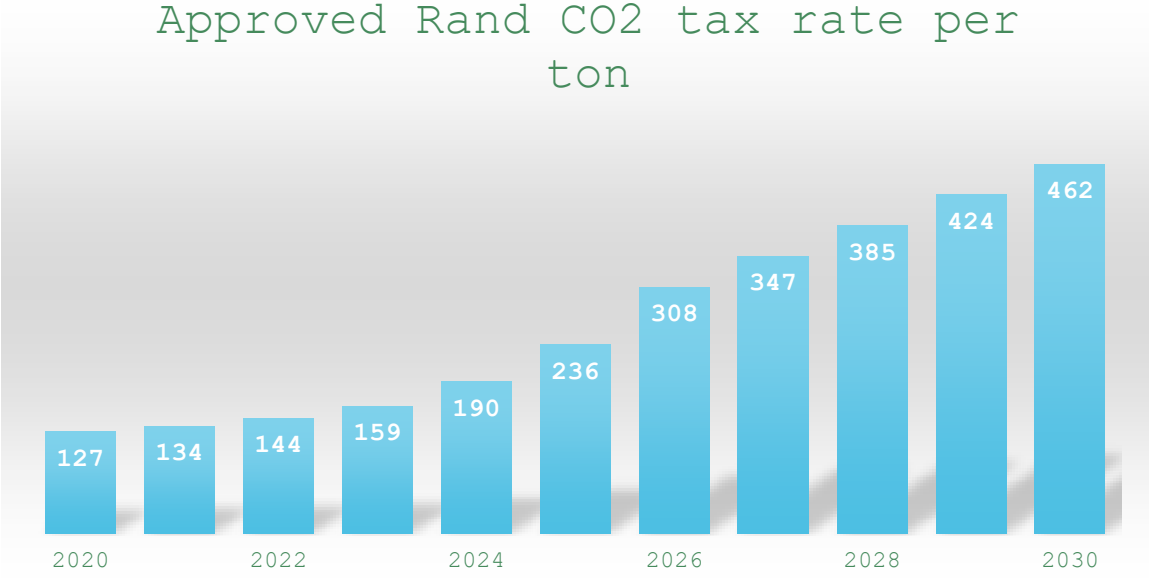


Notes/sources:

1. Source: Department of Forestry, Fisheries and the Environment, 2022: National GHG Inventory Report South Africa 2000 – 2020. Pretoria. (NIR8)
2. Source: Republic of South Africa, 2021: South Africa First Nationally Determined Contribution Under The Paris Agreement (Updated). (Updated SA NDC)
3. Source: Republic of South Africa, 2020: South Africa's Low-Emission Development Strategy 2050. (LEDS)

Carbon TAX Rates South Africa 2020 - 2030

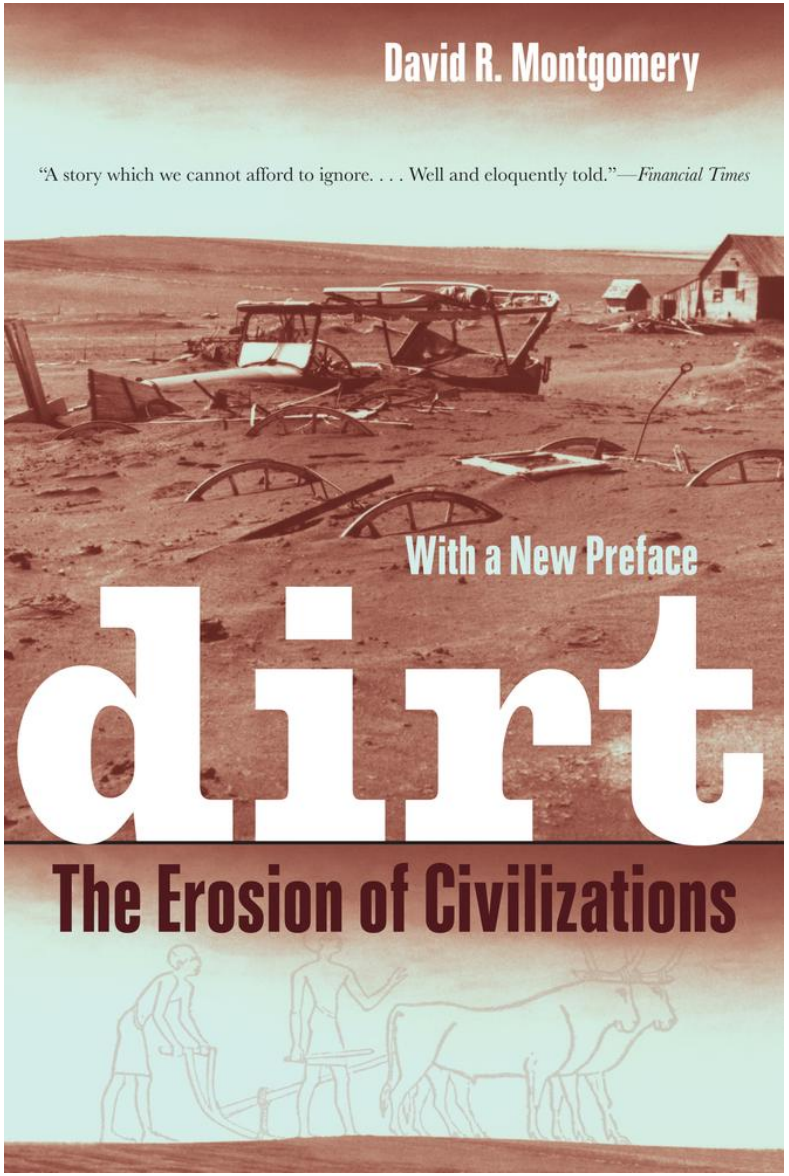
→ Carbon (tax) offsets transact at around 80-90% of the carbon tax rate.

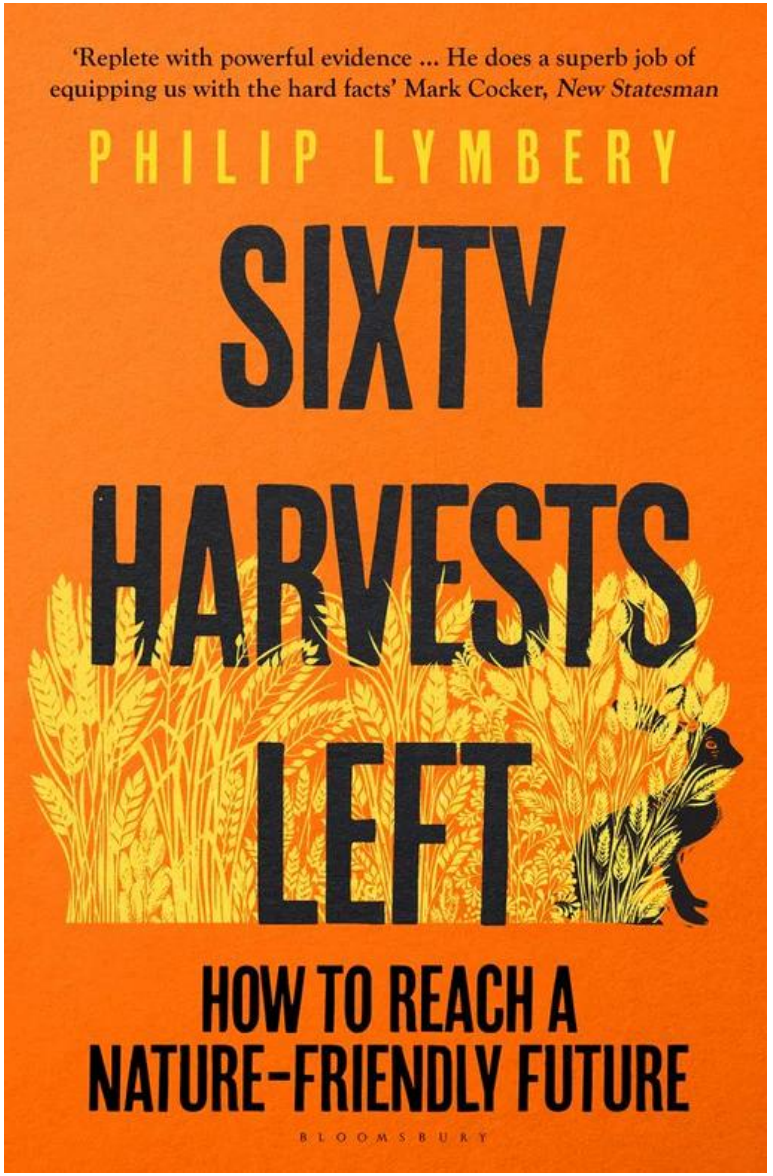


Taxation Laws Amendment Act 20 of 2022

- Carbon tax rate in 2026: US$20 equivalent
- Carbon tax rate in 2030: US$30 equivalent

ZAR rates in the graph as per USD/ZAR ex rate in 2022

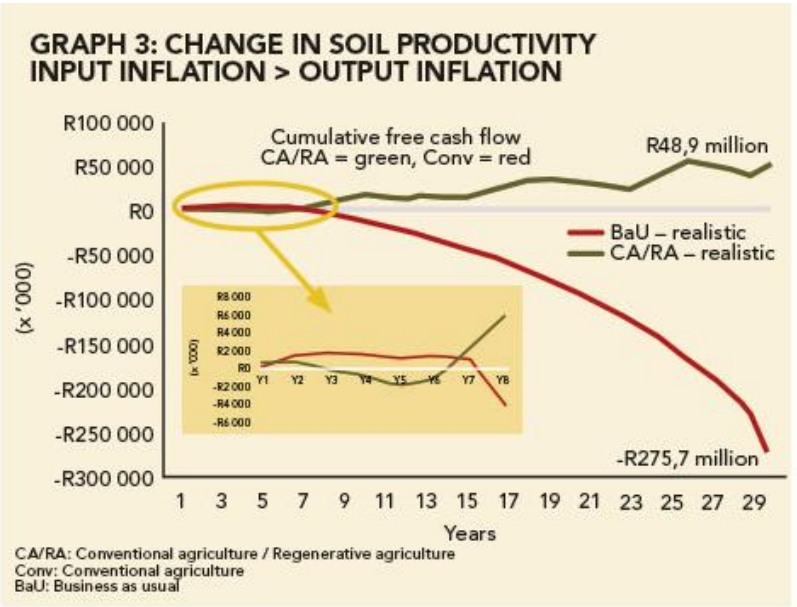

David R. Montgomery
"A story which we cannot afford to ignore. . . . Well and eloquently told."—*Financial Times*
With a New Preface
dirt
The Erosion of Civilizations


'Replete with powerful evidence ... He does a superb job of equipping us with the hard facts' Mark Cocker, *New Statesman*
PHILIP LYMBERY
SIXTY HARVESTS LEFT
HOW TO REACH A NATURE-FRIENDLY FUTURE
BLOOMSBURY

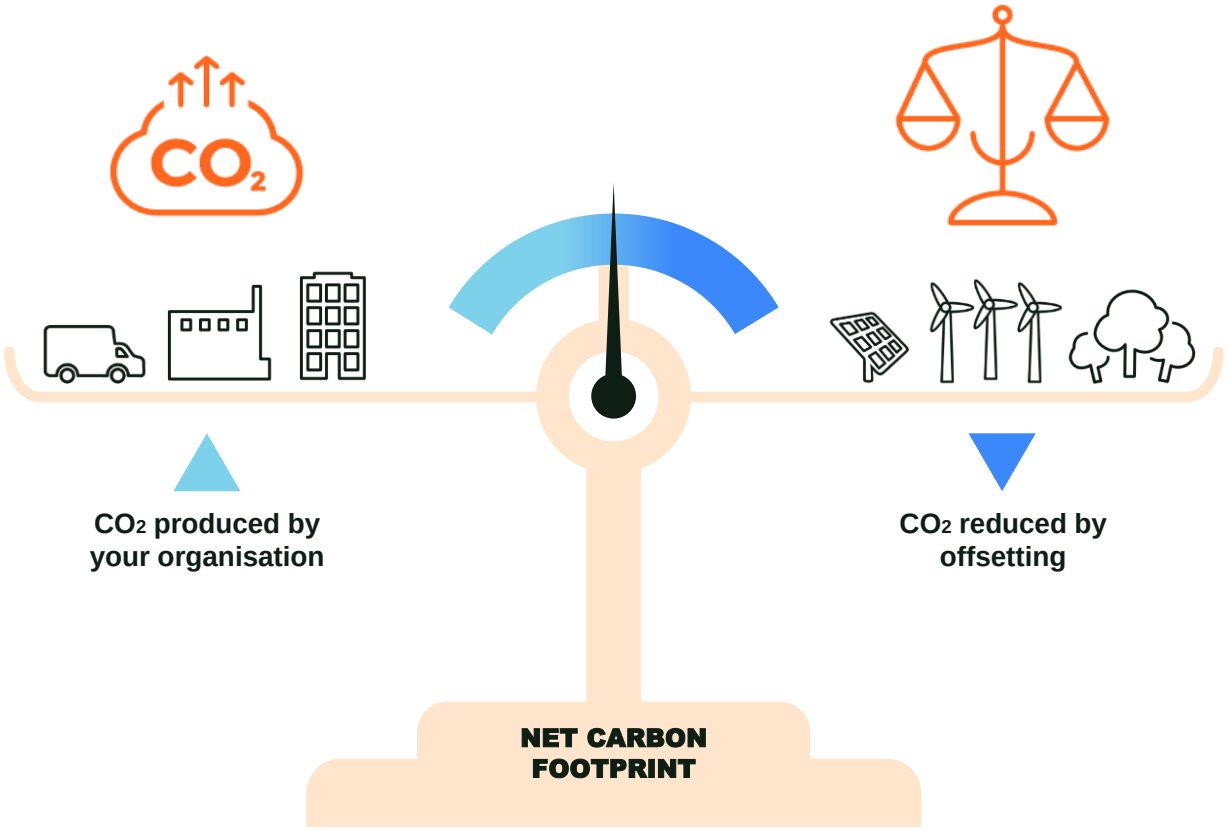
"Cultivated soils in South Africa have **lost between 45% and 65% of their carbon**
due to conventional tillage (CV) practices over the last 50 to 100 years, which implies that their current reserves of Soil Organic Carbon (SOC) are much lower than their potential capacity. **This suggests a huge carbon sequestration potential."**

~ AgriSA - Implications of a carbon tax and offset system for Agriculture in South Africa 2017

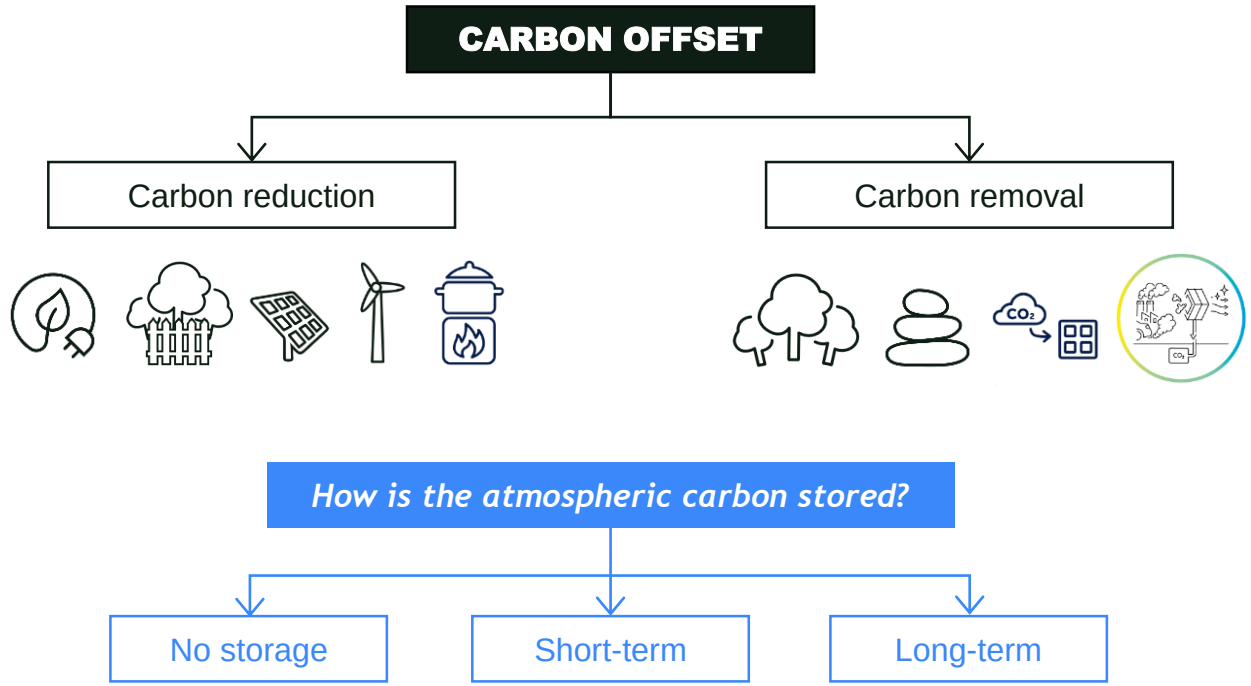
Need to scale
Regenerative Agriculture in South Africa?



What is a carbon offset?



TAXONOMY OF OFFSETS
OXFORD PRINCIPLES




AgriCarbon
Part of Anthesis
Africa's First Regenerative Farming Project to Achieve Verra Registration and Carbon Credit Issuance

What carbon credit issuance means:

For Our Farmers

Creates revenue through carbon credits, rewarding sustainable practices that improve soil, boost biodiversity, and enhance climate resilience. Regenerative methods increase yields, cut costs, and secure long-term profitability.

For Our Carbon Credit Buyers

Provides assurance that credits meet the highest standards of quality and integrity, enabling companies to confidently demonstrate their commitment to tackling climate change responsibly.

For Regenerative Agriculture

Supports a sustainable business model where farming practices actively reduce carbon emissions while enhancing food production, strengthening rural economies, and improving soil health for future generations.

Verra Verified Carbon Standard

The VCS Program is the world's **most widely** used **voluntary GHG program**.

Over **1,806 certified VCS projects** have collectively reduced or removed more than **928 million tonnes of carbon and other GHG emissions** from the atmosphere.

VERRA Standards for a Sustainable Future

Climate, Community & Biodiversity Standards

Verified Carbon Standard

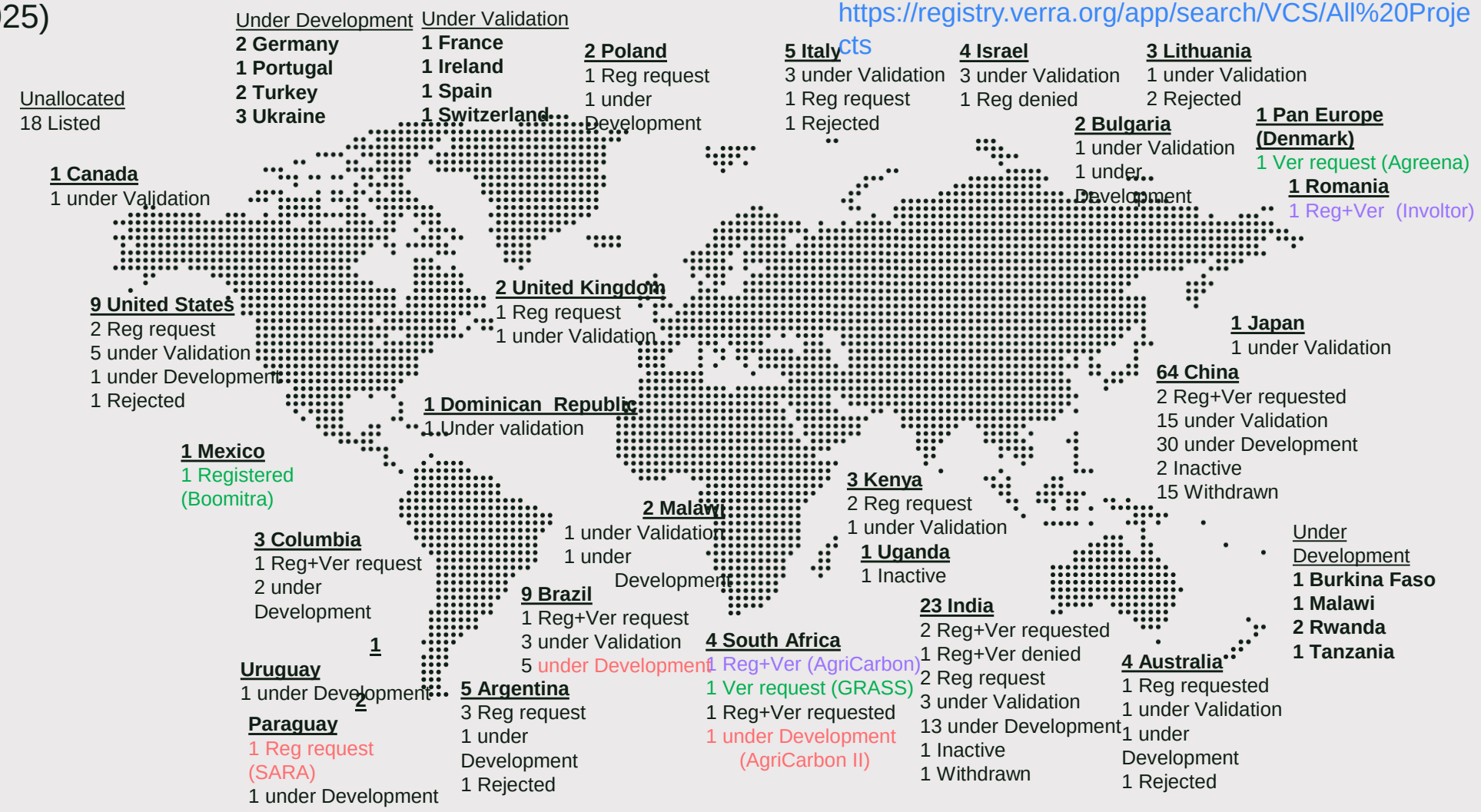
Sustainable Development Verified Impact Standard

California Offset Project Registry

Jurisdictional & Nested REDD+

187 VM0042 IALM projects on Verra Registry (as of 09 March 2025)

https://registry.verra.org/app/search/VCS/All%20Projects



The programme

AgriCarbon empowers farmers to embrace regenerative practices like cover cropping, reduced tillage, and diverse crop rotations.

These methods improve soil health, increase productivity, and turn farmland into carbon sinks—capturing CO_2 from the atmosphere and helping to combat climate change.

First Issuance numbers:

39 207t
carbon credits issued over 3 yr reporting period (2018 – 2021)

17 500+
Hectares

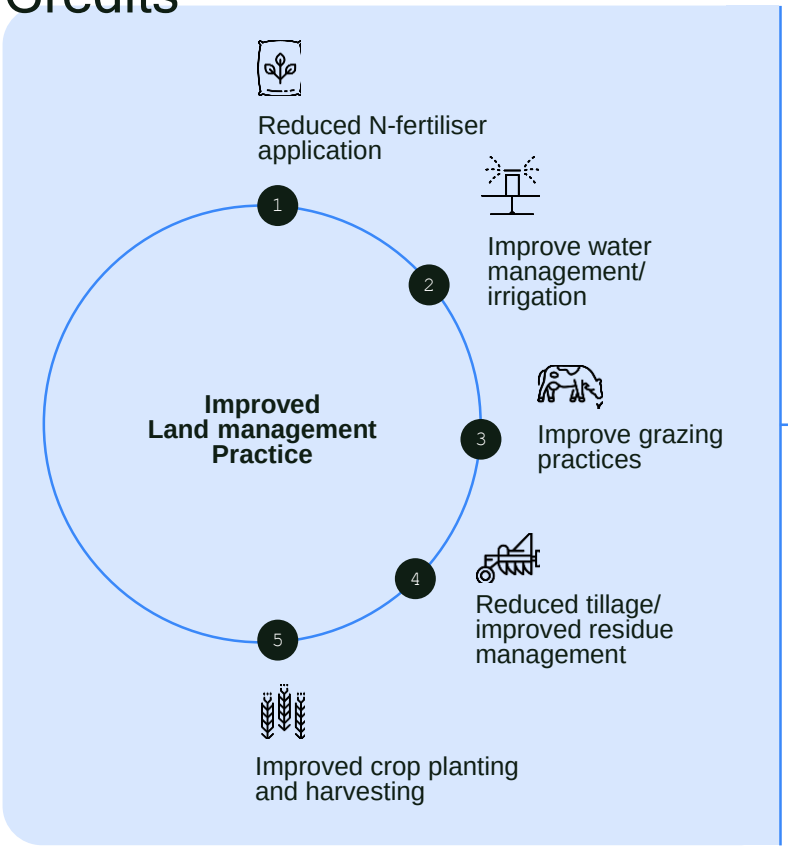
29
Farmers in the dairy sector

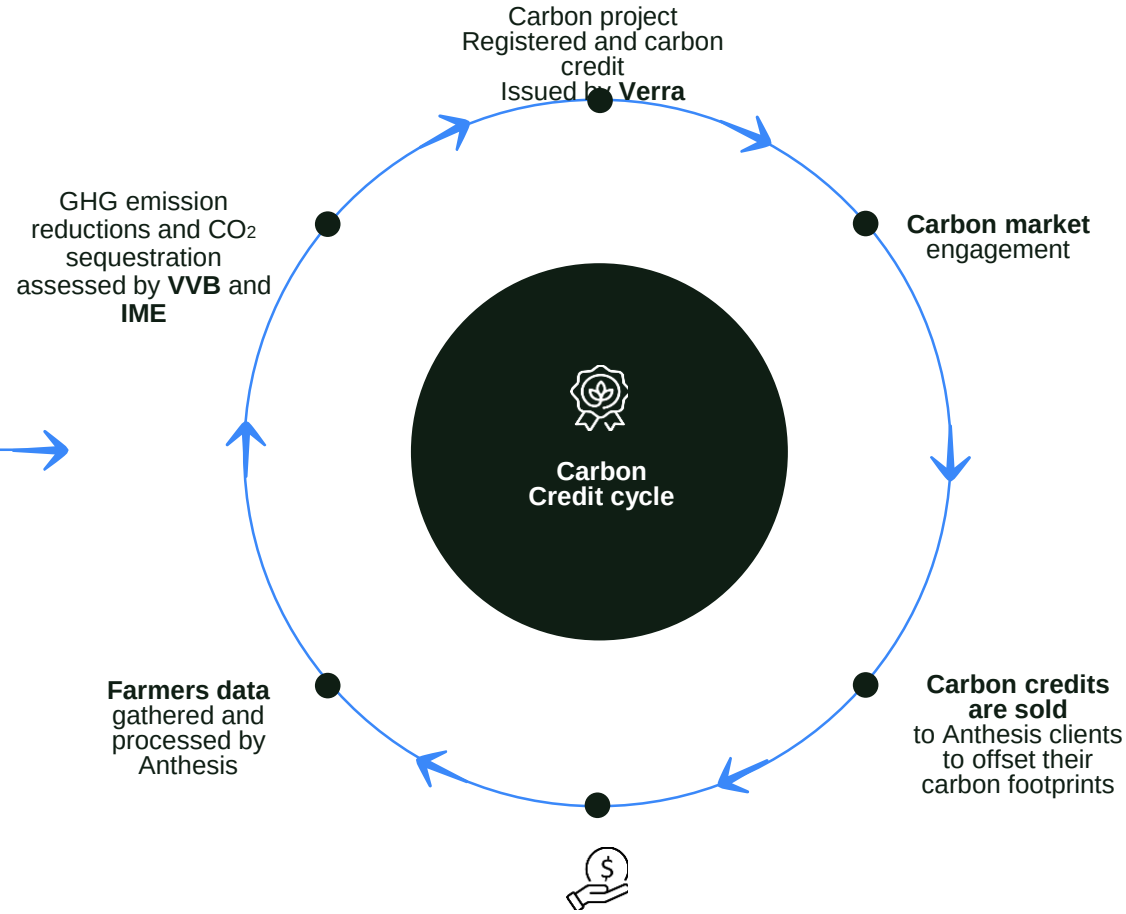
Total numbers to date:

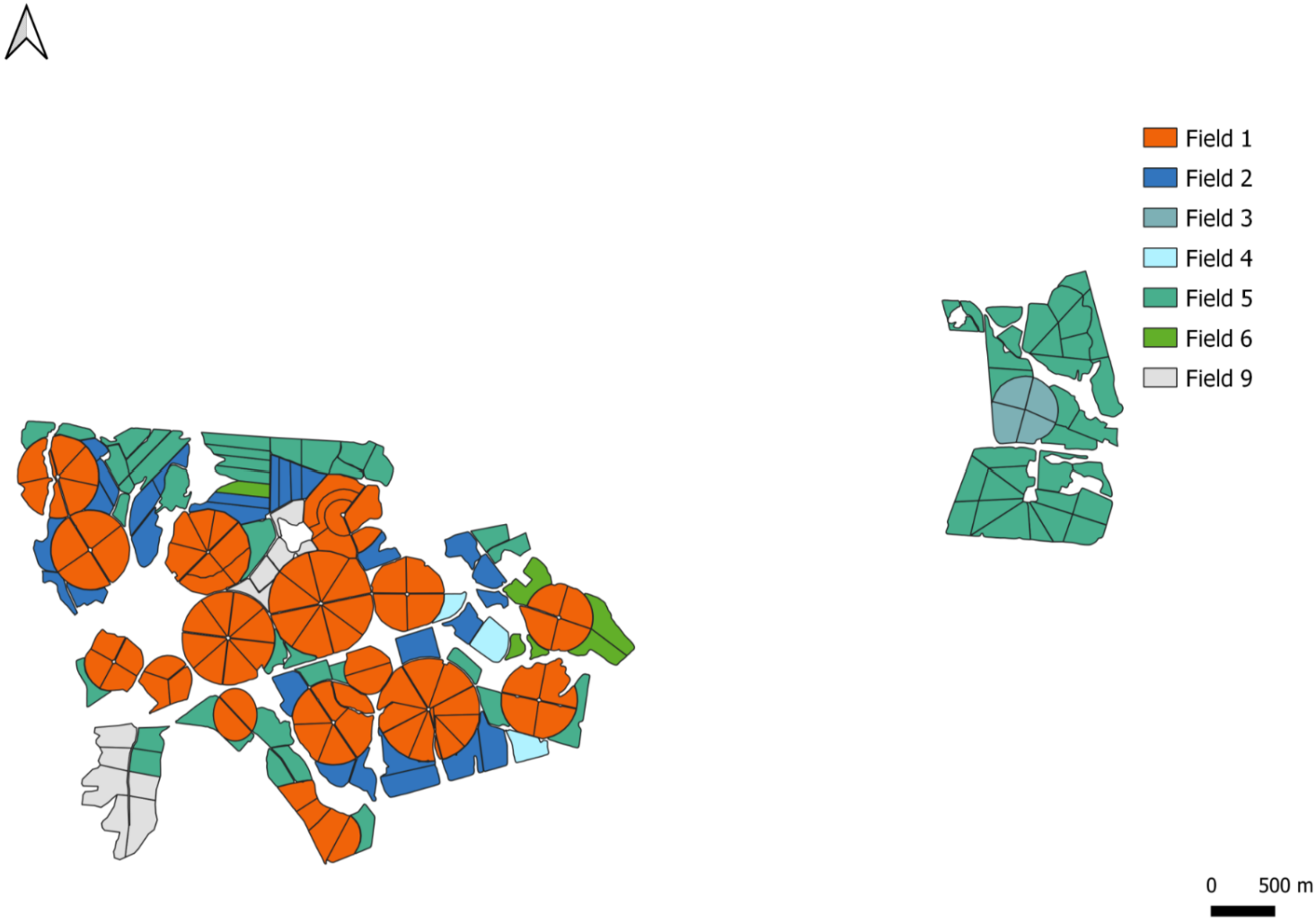
200 000+
Hectares enrolled

119
Farmers enrolled

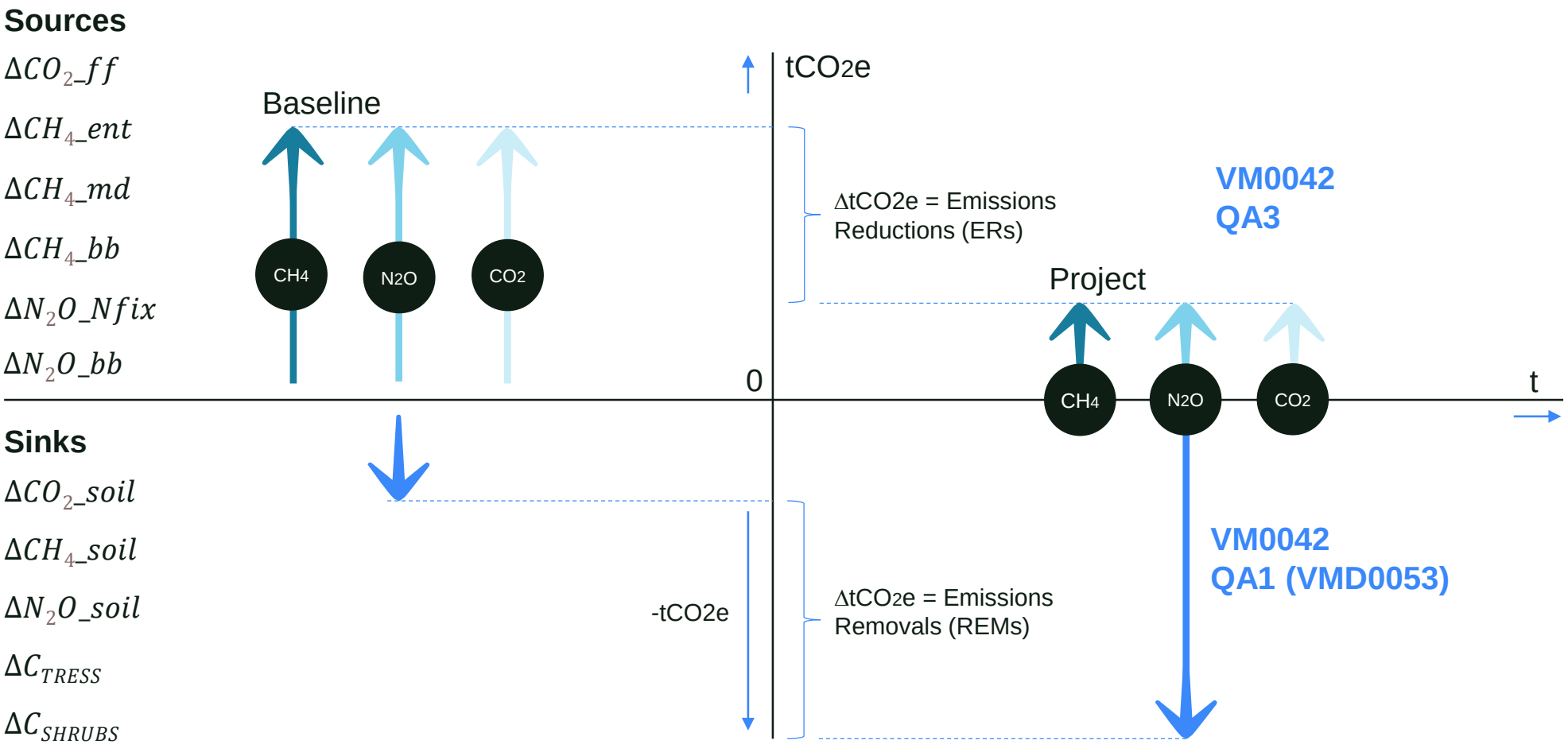
Enrolled farmers implementing improved land management practices that reduce GHG emissions and sequester carbon are eligible for Carbon Credits





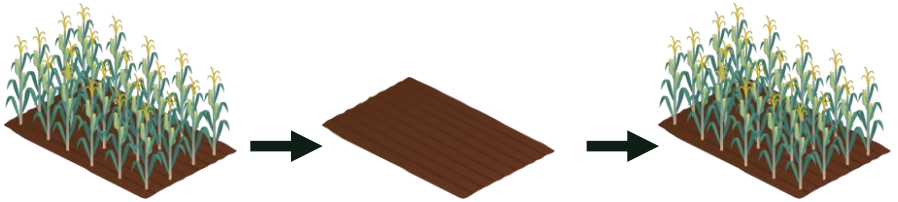

Field 1
Field 2
Field 3
Field 4
Field 5
Field 6
Field 9
0
500 m

Quantifying emission reductions and removals in AgriCarbon

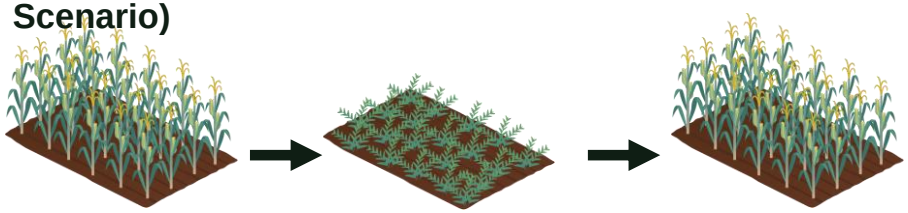


SOC Modelling Overview - RothC Model Case Study

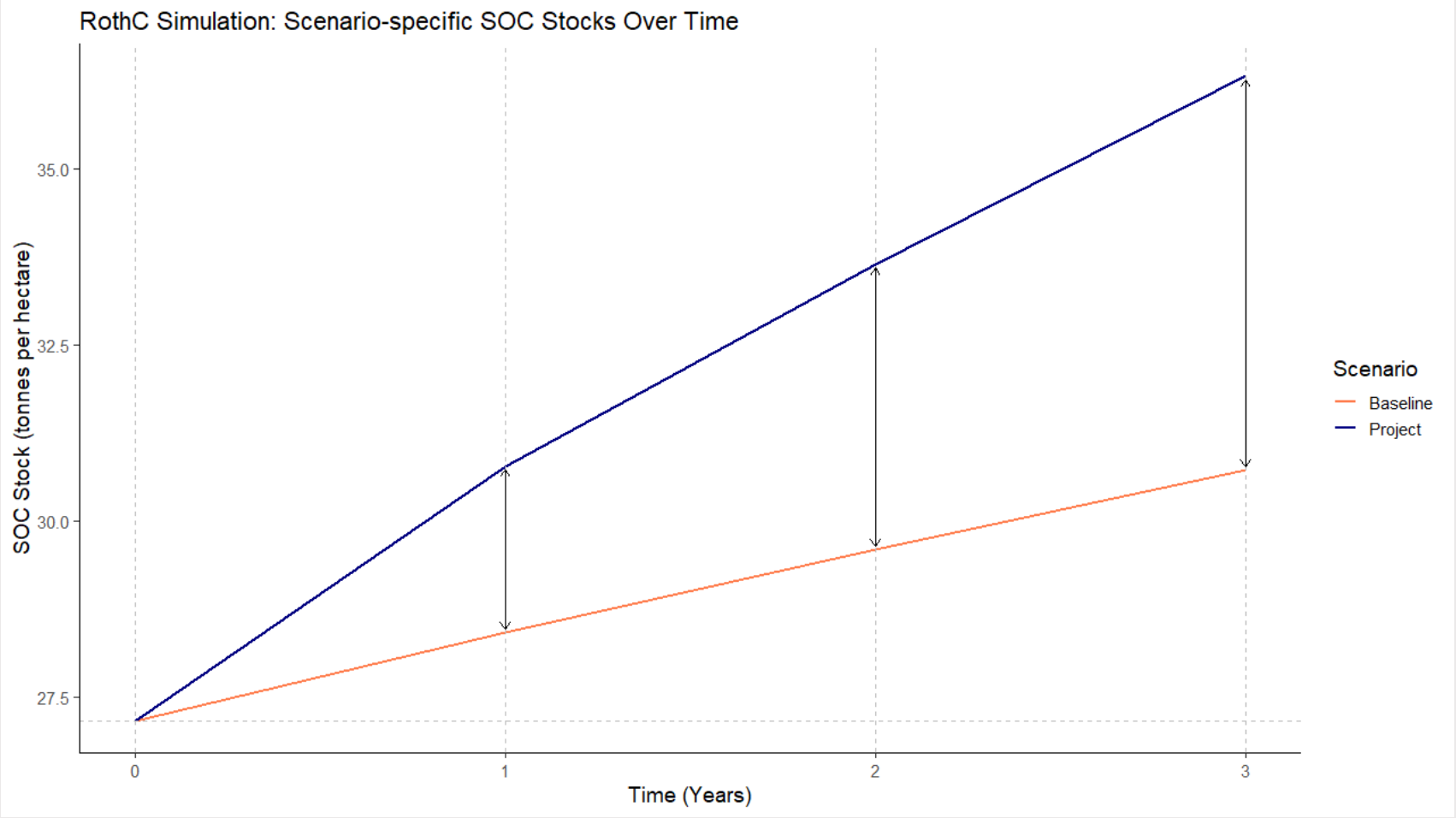
Traditional Agriculture (Baseline scenario)



Conservation Agriculture (Project Scenario)



SOC Modelling Overview



Data processing

Questionnaire

Individual agri-questionnaires send to 39 farmers.

Aggregated

Data collected and aggregated into a master database for processing.

Data Quality

Data quantity checks completed on all data point to test for consistency and accuracy.

Revision

Data issues are revised with each farmer and reinputted.

Emissions Calc

Data is run though the emission model which calculates the total emissions due to Carbon Dioxide, Methane & Nitrous Oxide Sequestration.

SOC Simulation

The RothC model is used to simulate the change in soil organic carbon due to improved land management practices.

Net Emissions

The emissions and SOC levels are converted to carbon equivalent and aggregates to generate a Net Emission per field.

Auditor

The emission are submitted to the auditor jointly with artefacts supporting evidence.

Approved

The Auditor approves and carbon credits are issues.

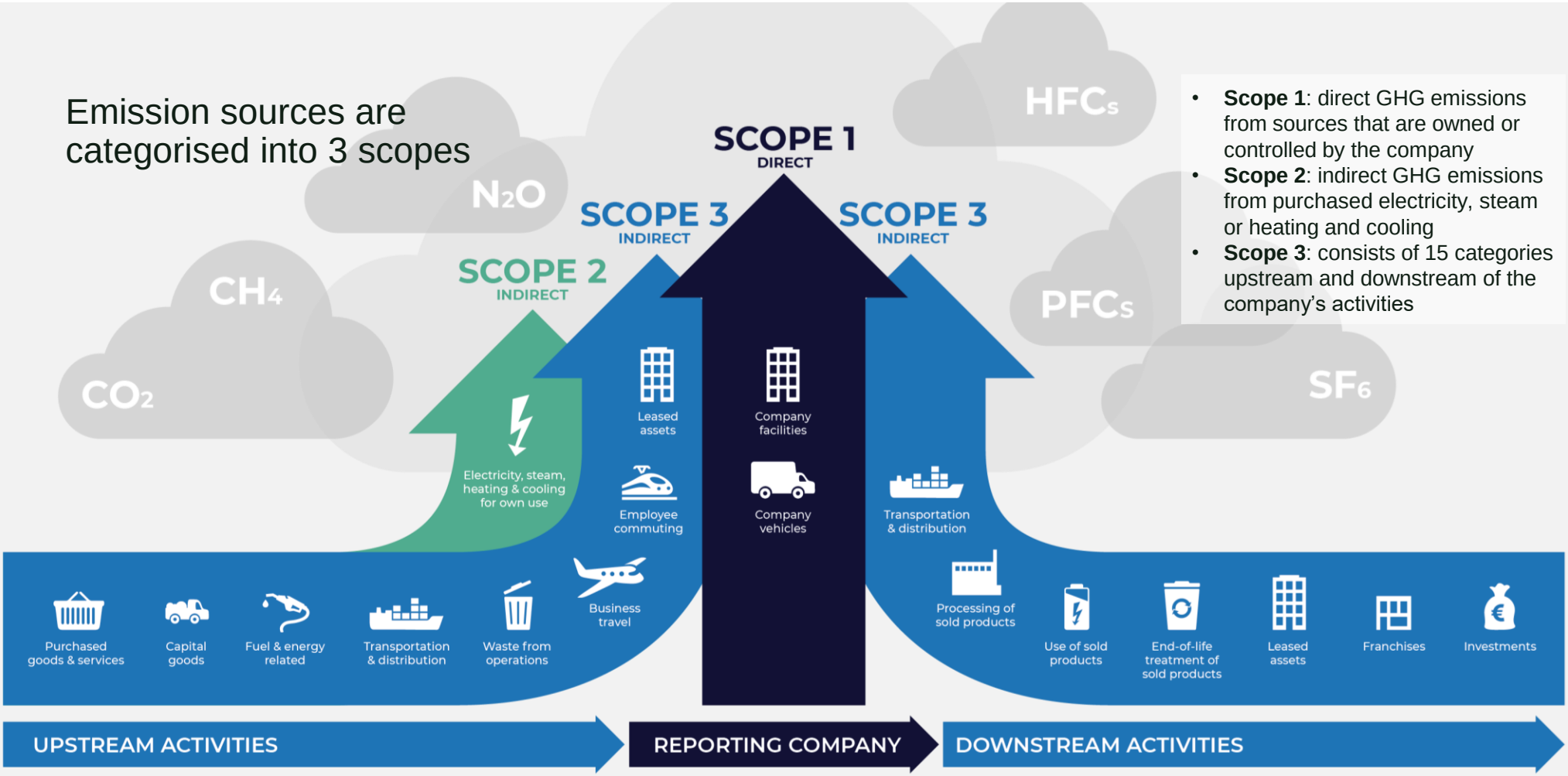
20 MONTHS

16 MONTHS

What to consider when joining a carbon farming programme

1. **Understanding Carbon Farming Practices:** Farmers need to familiarize themselves with the specific practices involved, such as cover cropping, reduced tillage, reduced fertiiser us, and rotational grazing. Understanding these practices helps in assessing their feasibility and benefits.
2. **Economic Viability:** Evaluate the financial aspects, including potential costs and benefits. This includes initial investments, potential income from carbon credits, and long-term savings from improved soil health and productivity.
3. **Technical Support and Training:** Check if the program offers adequate technical support and training. This is crucial for successfully implementing and maintaining sustainable practices.
4. **Soil and Land Suitability:** Assess the suitability of their land for carbon farming practices. Soil type, climate, and existing land use can influence the effectiveness of carbon sequestration methods.
5. **Program Requirements and Commitments:** Understand the specific requirements and commitments of the program, such as monitoring, reporting, and verification processes. Ensure they are manageable and align with the farmer’s capacity.
6. **Environmental and Social Benefits:** Consider the broader environmental and social benefits, such as improved biodiversity, water retention, and community resilience. These can add significant value beyond financial gains.
7. **Long-term Sustainability:** Evaluate the long-term sustainability of the practices and the program itself. Sustainable practices should enhance soil health and productivity over time, ensuring ongoing benefits.
8. **Policy and Market Conditions:** Stay informed about relevant policies and market conditions that can impact the viability and profitability of carbon farming. This includes government incentives, carbon market trends, and regulatory requirements.

Emission sources are categorised into 3 scopes



- **Scope 1**: direct GHG emissions from sources that are owned or controlled by the company
- **Scope 2**: indirect GHG emissions from purchased electricity, steam or heating and cooling
- **Scope 3**: consists of 15 categories upstream and downstream of the company's activities

Soil Carbon:
A scalable high-impact solution for global net-zero

About Anthesis:

Anthesis is the sustainability activator. We seek to make a significant contribution to a world which is more resilient and productive. We do this by working with cities, companies, and other organisations to drive sustainable performance. We develop financially driven sustainability strategies, underpinned by technical expertise and delivered by innovative collaborative teams across the world.

The company combines the reach of big professional services groups with the deep expertise of boutiques. Anthesis brings together 1250+ experts with 45 offices located in 23 countries including Andorra, Australia, Brazil, Canada, China, Colombia, Finland, France, Germany, Ireland, Italy, the Middle East, Belgium, the Netherlands, the Philippines, South Africa, Spain, Sweden, the UK, and the US.

In South Africa, our mission is to focus, almost entirely, on carbon offset project development and the sale of carbon credits. We aim to harness the carbon markets for Africa by increasing the development of carbon credit projects across various sectors with a focus on nature-based solutions,.

Our core offering includes:

Carbon Project Development
South African Carbon Tax and Carbon Advisory
Carbon Offsetting

AgriCarbon
Part of Anthesis

Workshop17, 32 Kloof Street Gardens, Cape Town, 8005

T: +27 21 300 6770
E: agricarbon@anthesisgroup.com
W: www.agricarbon.co.za

Citrus Sustainability Forum 2

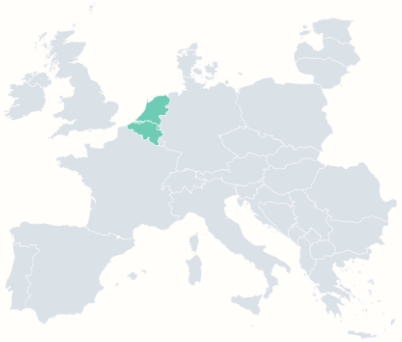
BRIGHTWOLVES

9 May 2025

Agenda

1. **BrightWolves introduction**
2. Carbon credits (VM0042 methodology)
3. Product carbon footprint (CBAM)
4. Beyond carbon (LCAs)

BrightWolves is a next-generation management consulting firm with +80 professionals across Benelux and South Africa



BRIGHTWOLVES

The world is changing fast – and so is your business. Our international team of consultants build a **more resilient future for your business** by helping you:

- **Grow** – expand with confidence through research & analytics
- **Optimise** – streamline your operations building critical capabilities
- **Digitalise** – tap into the power of digital, data and AI
- **Sustain** – turn sustainability into a competitive edge

We work shoulder-to-shoulder with you. From strategy to implementation.

We are proudly supported by our venture partners

DIGIT MINT

Digit Mint is our proprietary software tool designed to empower businesses to perform **life-cycle assessments.**

QuantIM

QuantIM is our network of +2.500 highly experienced **independent industry experts and interim managers.**

BrightWolves is empowered by Quanteus Group, currently counting +450 professionals worldwide.

Our team of transformation experts can strengthen your business on the following key capabilities

Grow	Optimise	Digitalise	Sustain
M&A and Integration	Operational Excellence	Digital Transformation	Sustainable strategy & implementation
Market & Customer Insights	Financial Performance	Data Transformation	Impact Assessment
	Transformation & Turnaround	Advanced Analytics	Reporting

See further for concrete offerings & credentials

We partner with you on your sustainability journey, communicating in the language of your stakeholders

Grow | Optimise | Digitalise | **Sustain**

Sustainable strategy & implementation	Impact Assessment	Reporting
Costed decarbonisation pathways	Carbon footprint	CSRD
Supplier engagement	Lifecycle assessment	SFDR & EU Taxonomy
Circular business model	Double materiality assessment	Green Claims
	ESG Due Diligence	Digital product passport

Some of the many clients we worked with

Agenda

1. BrightWolves introduction
2. **Carbon credits (VM0042 methodology)**
3. Product carbon footprint (CBAM)
4. Beyond carbon (LCAs)

Carbon credits

Voluntary carbon market (VCM)

What are they?

A carbon credit is a tradable certificate that represents **emission reductions or removals of one metric ton of carbon dioxide equivalent** from the atmosphere.

Companies or individuals can purchase these credits to **offset** their own carbon emissions.

How are they developed?

Carbon credits are developed by **project developers (PD's)** through projects that demonstrably reduce emissions in sectors such as renewable energy, reforestation and regenerative agriculture.

These projects must follow **accredited standards and methodologies** (e.g. VM0042) before being **validated and verified** by independent third parties (Validation & Verification Bodies).

Who issues them?

After successfully completing the third-party review process, projects are then accredited by the recognized standard bodies (for example: **Verra, Gold Standard and Puro Earth**) and are published on public registries.

These standard bodies promote the **transparency, traceability and credibility** of the project.

Key takeaways

The bigger picture?

The Science Based Targets initiative (SBTi) is a framework that can be used by a company to progress towards a **net-zero carbon emissions status**.

SBTi targets require companies to reduce their operational (Scope 1 and 2) and value chain (Scope 3) emissions in line with climate science to **limit global warming to 1.5°C**.

Carbon credits do not count toward achieving these targets but may be used beyond them – **to finance climate action or neutralize residual emissions after all feasible reductions have been made.**

Additionality

Above-and-beyond usual practices

“The cover crops that wouldn’t be planted”

Imagine you're walking past a citrus orchard with the farmer and notice the bare soil below the trees and within the inter rows.

You ask the farmer, “Are you going to plant cover crops here?”

- If the farmer says “Yes, I am already planned to do that – all of my neighbours are already using cover crops,” then no carbon credits should be issued – those cover crops were going to be planted anyway.
- But if the farmer says “No, I’m not planning on planting cover crops due to the expense of seeds and new implements, but if I get some help (like funding from carbon credits), then I will,” – that’s additional.

Carbon credits are only applicable when the environmental benefit – like planting those cover crops – happens because of the carbon credit project funding.

Key takeaways

Why it matters?

Without additionality, the carbon credit system loses credibility.

It’s like giving someone a reward for doing something they were already planning to do – it doesn’t drive real change.

Additionality

Above-and-beyond usual practices

What is it?[1]

A project activity is additional if:

- it can be demonstrated that the activity results in reductions or removals that are **in excess of** what would be achieved under a **"business as usual" scenario** and
- the activity **would not have occurred** in the **absence of the incentive** provided by carbon markets.

Why is it used?

Additionality is an important characteristic of GHG credits because it indicates that they represent a **net environmental benefit** and a **real reduction** of GHG emissions and can thus be used to offset emissions.

How is it assessed?

General

Regulatory surplus:

Project activities **shall not be mandated** by any law, statute, or other regulatory framework.

Methodology-specific (e.g. VM0042)

Implementation barriers:

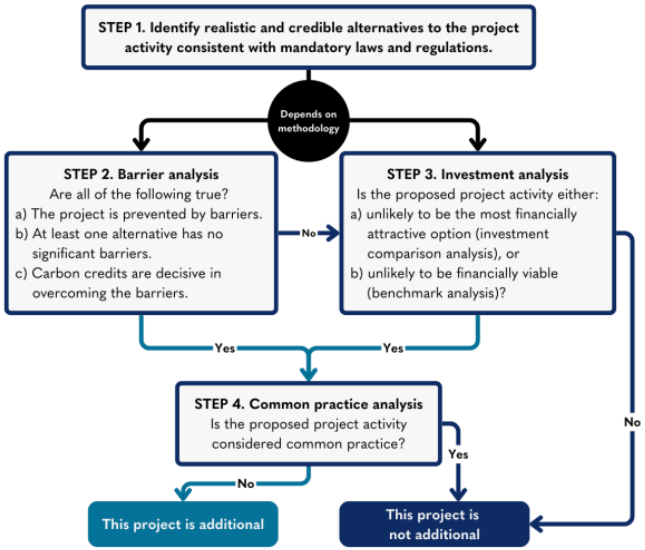
Identify institutional barriers that would **prevent the implementation** of a change in pre-existing ALM practices.

Common practice:

Demonstrate that adoption of the suite of proposed project activities **is not common practice**. The common practice threshold is below or equal to 20% adoption.

Process flow

Figure 1: Process flow for assessing additionality under *VT0008*



[1]As defined by the Verified Carbon Standard (VCS) v4.7.

Regenerative agriculture opportunity

Verra's VM0042 methodology

Practice change conditions:

A practice change **constitutes any of the following**:

- **Adoption** of a new practice (e.g. cover cropping);
- **Stopping** a pre-existing practice (e.g., tillage or flood irrigation);
- **Adjusting** a pre-existing practice (e.g. shifting to enhanced efficiency nitrogen fertilizers);
- Some combination of the above.

Any quantitative adjustment (e.g., decrease in fertilizer application rate) must **exceed 5% of the pre-existing value** to qualify as a practice change.

Project activities must be implemented on land that is either cropland or grassland at the project start date.

Prohibitions

The VM0042 methodology is **not applicable** under the following conditions:

- The project area has been **cleared of native ecosystems** within the **10-year period** immediately **prior to the project start date**.
- The project activity is expected to cause a **sustained reduction in productivity of 5% or more**.
- The project activity is **biochar application**.
- The project activities occur on a **wetland**.

Regenerative agriculture opportunity

Verra's VM0042 methodology

Improved agricultural land management (ALM) practice(s)

Practices focus on **carbon emission reductions** and **carbon removals into the soil**.

Projects introduce or implement one or more new changes to pre-existing ALM practices which:

a) Improve **fertilizer** (organic or inorganic) management;

b) Improve **water** management/irrigation;

c) Reduce **tillage**/improve **residue** management;

d) Improve **crop planting and harvesting** (e.g., improved agroforestry, crop rotations, cover crops); and/or

e) Improve **grazing** practices.

Appendix 1 of VM0042 provides **a non-exhaustive list** of eligible ALM practices.

Key takeaways

Rands / cents value?

Estimated carbon potential

Mean annual mitigation potentials (warm-dry climate zone) per ha per year[1]:

- Agronomy: 0.39 tCO2 eq
- Nutrient management: 0.33 tCO2 eq
- Tillage & residue management: 0.35 tCO2 eq
- Water management: 1.14 tCO2 eq

Estimated carbon credit pricing

~R120 per tCO2 eq in 2023 for agriculture projects[2]

There are numerous factors effecting carbon credit prices ranging from quality, type, size and geographical location.

[1] Values are dependent on soil type, climate and crop management practices. Sourced from: Table 8.4 in "2007: Agriculture. In Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change".

[2] Sourced from the Africa Carbon Market Initiative (ACMI): https://cmap.africacarbonmarkets.org/pricing-insights

Agenda

1. BrightWolves introduction
2. Carbon credits (VM0042 methodology)
3. **Product carbon footprint (CBAM)**
4. Beyond carbon (LCAs)

Future-proofing for export markets

Carbon Border Adjustment Mechanism (CBAM)

What is it?

CBAM is a policy tool introduced by the European Union (EU) to prevent "carbon leakage“ – a situation where companies transfer production to countries with weaker carbon regulations. It **imposes a carbon price** on certain imported goods based on their carbon footprint, aligning the cost of imports with the EU’s internal carbon pricing system (the EU Emissions Trading System, or ETS).

Risk of double-taxation?

If an exporting country already imposes a carbon price or carbon tax that is equivalent to or similar to the EU's ETS:

The carbon price paid in the exporting country is deducted from the CBAM charge.

What sectors are affected?

Initially, the **EU’s CBAM** targets sectors that are both emissions-intensive and prone to carbon leakage. These include:

- Cement
- Iron and steel
- Aluminum
- Fertilizers
- Electricity
- Hydrogen

More sectors (e.g. agriculture) may be added over time as the mechanism evolves, depending on carbon leakage risks and regulatory decisions.

Are other countries considering CBAM?

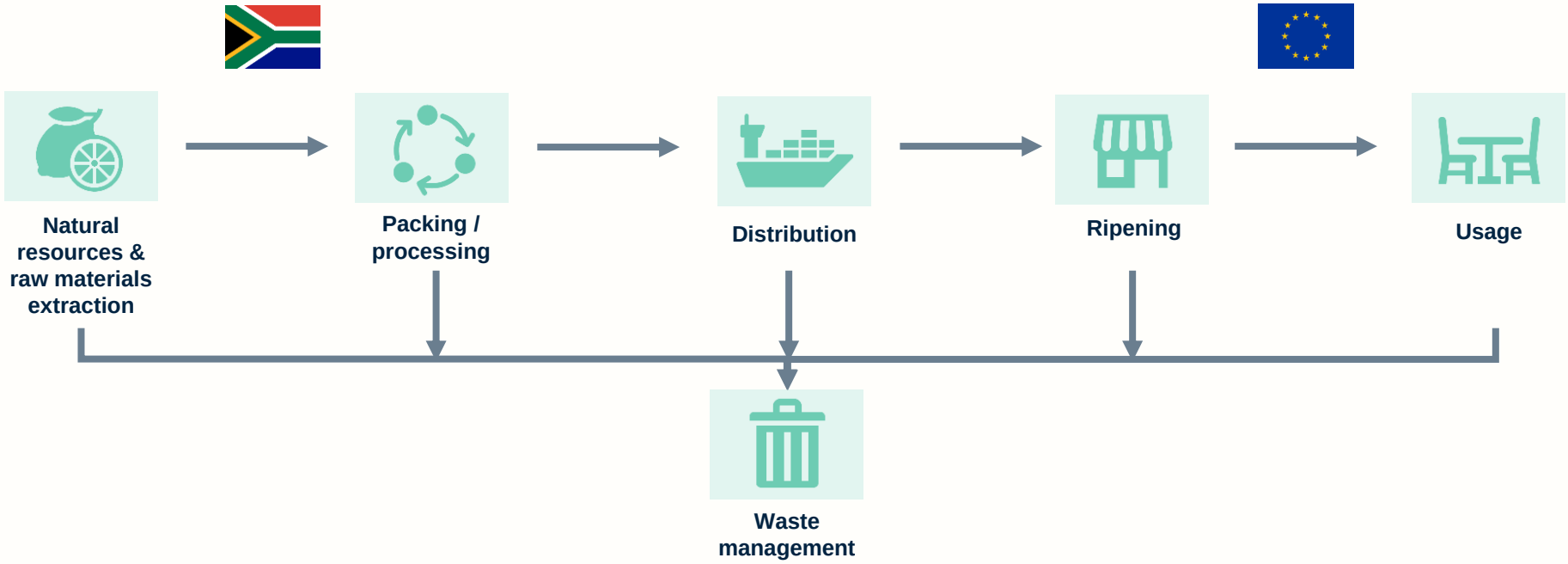
Currently, the **EU is the only jurisdiction enforcing a CBAM**, with implementation beginning in a transitional phase from October 2023, and full enforcement set for 2026.

Other countries, like **Canada, the United Kingdom and Australia**, are exploring similar mechanisms but have not yet enacted formal CBAM policies. The EU's move has triggered international discussions on carbon pricing and trade fairness.

Life cycle of a product

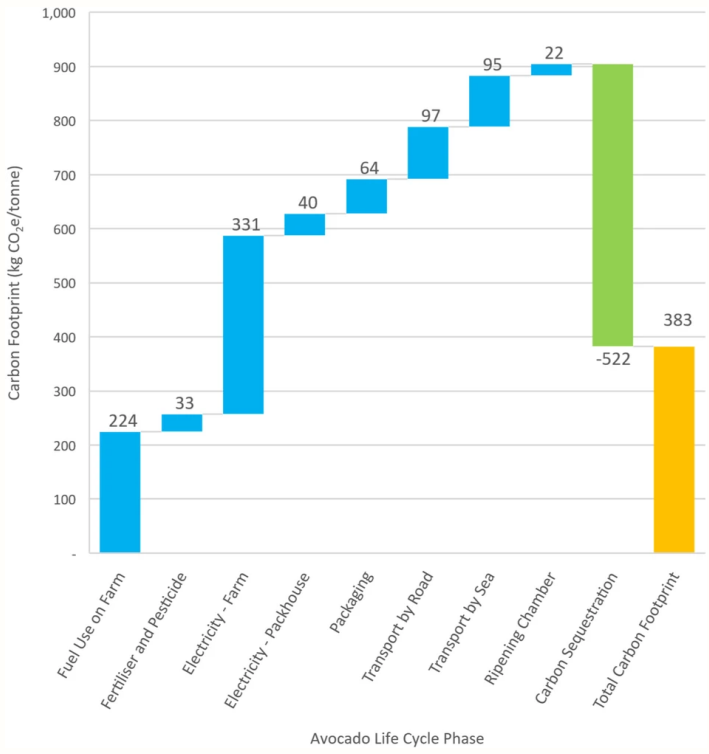
The concept of a life cycle and its various stages as related to the assessment of products

The product life cycle encompasses the **stages of introduction**, **growth**, **maturity**, and **decline** that a product goes through from **raw material extraction** to **end of life discontinuation**. Life cycle thinking is **not restricted to manufactured products**. **Services**, **systems**, and even **entire urban areas** can be better understood via life cycle thinking.



Determining a product carbon footprint

Understanding the bigger picture



Environmental Management (2024) 74:989–1005
https://doi.org/10.1007/s00267-024-02009-w

Life Cycle Assessment of an Avocado: Grown in South Africa—Enjoyed in Europe

Sheldon A. Blaauw[1,2] · André Broekman[2,3] · James W. Maina[2] · Wynand J. v. d. M. Steyn[2] · William A. Haddad[4]

Received: 13 January 2024 / Accepted: 16 June 2024 / Published online: 27 June 2024

"Utilising the results of the LCI for the various life cycle phases previously described of a typical avocado grown in South Africa and enjoyed in Europe, the Life Cycle Impact Assessment (LCIA) may be calculated for the base year of 2022 and a functional unit of one-tonne product.

- total carbon input of 904.85 kg CO2e/tonne.
- 521.88 kg CO2e/tonne is offset.

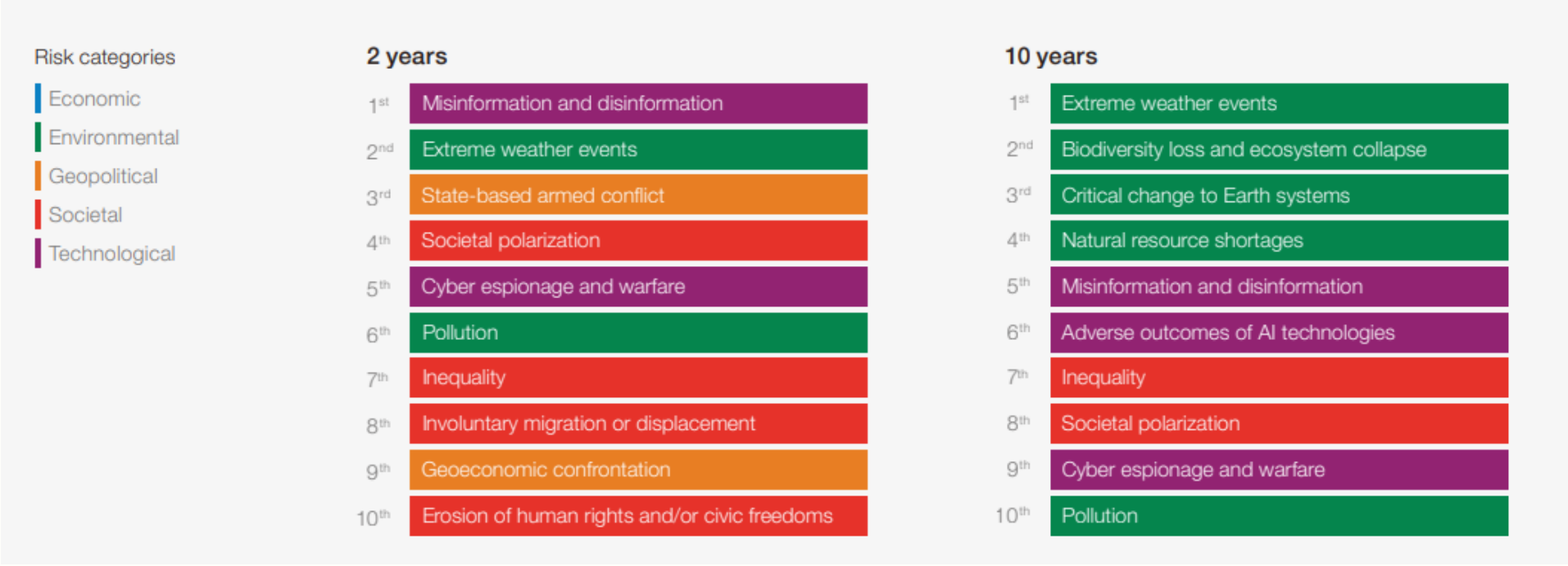
= net carbon footprint of 382.97 kg CO2e/tonne or 57.45 g CO2e/avocado grown in South Africa and sold in Europe."

"You can only manage what you measure" – Al Gore

Agenda

1. BrightWolves introduction
2. Carbon credits (VM0042 methodology)
3. Product carbon footprint (CBAM)
4. **Beyond carbon (LCAs)**

Should we only be focusing on carbon footprints?



*World Economic Forum:
The Global Risks Report 2025

Climate Change is certainly an urgent challenge, however, companies should be looking above and beyond just carbon emissions to mitigate the numerous other environmental challenges we face.

Should we only be focusing on carbon footprints?

The Guardian

Int

pinion | Sport | Culture | Lifestyle

Climate crisis Middle East Ukraine Environment Science Global development Football Tech Business Obituaries

Biodiversity loss in all species and every ecosystem linked to humans – report

Sweeping synthesis of 2,000 global studies leaves no doubt about scale of problem and role of humans, say experts

Most viewed

Freshfel sets out FreshProducePEFCR progress

By Maura Maxwell | 10 April 2025

At an event in Brussels, the organisation outlined the next steps for its implementation in the F&V sector

The Technical Secretariat (TS) of the FreshProducePEFCR, which has developed the technical rules for calculating the environmental footprint of fruits and vegetables as part of Freshfel's

vironmental Footprint Initiative, welcomed more th

presentatives to its event 'Presentation of the Fresh

European Commission

The Joint Research Centre: EU Scienc

Home > JRC news and updates > World Drought Atlas:

NEWS ANNOUNCEMENT | 2 December 2024 | Joint Res

World Drought Atlas: the global water crisis requires urgent action

Climate change and unsustainable water and land management increase drought risk globally. The World Drought Atlas shows the current conditions and the emerging risks. It also offers concrete elements to boost actions to achieve drought resilience.

Moneyweb DATA JSE ALSI 89,742 2025-04-22 16:30 USD/ZAR 18.60 2025-04-22 16:39

Can the world unite to end the plastic pollution crisis?

Plastic production will jump about 60% to 736 million tons a year by 2040.

By Leslie Kaufman and Aaron Clark, Bloomberg · 12 Jan 2025 03:01

Climate Change is certainly an urgent challenge, however, companies should be looking above and beyond just carbon emissions to mitigate the numerous other environmental challenges we face.

What is a Life Cycle Assessment?

Definition, purpose and outcome of an LCA

WHAT

A life-cycle assessment (LCA) is a **methodology** used to **evaluate the environmental impacts** of a **product, service or process** throughout its **entire life cycle**

LCAs emerged **from academia and industry** in the **60-70s**, but the methodology became **mature** and **standardized (ISO)** only in the **90s**

WHY

Identify the **key environmental impacts** of a product *(GHG emissions, water, land use, …)*

Help businesses make **informed decisions** about design & use of their products

Results can be used to enroll in **eco-labeling** / certifications programs

Foster **transparency** and **accountability** in organizations on environmental issues

HOW

1. **Scope and goal definition**
2. **Inventory analysis**
3. **Life cycle impact assessment**
4. **Unlocking business value**

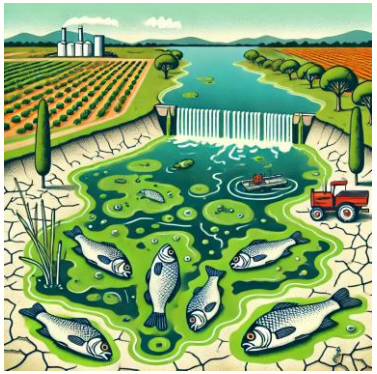
Life Cycle Impact Assessment (LCIA)

The LCIA helps in evaluating the potential environmental impact associated with a product, service or process across its entire life cycle

Global warming potential

Water use

Land use



Eutrophication

Acidification

Impact assessment is about being able to consider the **actual effects on humans, ecosystems, and resources**, instead of merely tracking quantities like tons of emissions or gallons of fuel consumed because of production

BRIGHTWOLVES

Keen to explore LCAs further or discuss other sustainability topics?

DIGIT MINT

1) Academy	2) Consulting	3) Software
Embark on our **practical LCA training modules** to **become** a proficient **LCA practitioner**	**Leverage our LCA** practitioners' **expertise** for **insightful**, **actionable recommendations** on your product's impact	Utilize our **collaborative**, **cloud-based platform** to **measure** and **reduce** your **environmental impact**
Elevate your LCA skills to consistently **enhance** your product's **environmental performance**	**Engage** with our **LCA experts** for **personalized insights and advice** on your LCA opportunities	**Schedule a demo** to explore how our **Digit Mint platform** can enhance your product's LCA performance

Feel free to reach out to us to connect in-person or remotely.

We would love to chat further!

Alistair Galloway

alistair.galloway@brightwolves.co.za

EU Legislative Updates

- Corporate Sustainability Due Diligence Directive (CS3D) Review
  - Proposed changes ongoing discussion
  - Implementation delayed until 26 July 2028

- Corporate Sustainability Reporting Directive (CSRD) Review
  - Changes proposed
  - Implementation delay proposal

- EU Deforestation Regulation
  - Implementation postponed and will now apply from 30 December 2025 (as apposed to December 2024)
  - Clarifications – excluding pallets, cardboard used to support, protect, or carry products

Citrus Growers' Association OF SOUTHERN AFRICA

MRL update

- RUR No. 58 of April 2025

SUMMARY TABLE OF CHANGES EFFECTIVE FROM THIS EDITION

Active	Country	Previous MRL	New MRL	PHI Changes
Amitraz	South Korea	0.7[20], 0.2[13], 0.01[7,19]	0.05[7], 0.2[13], 0.7[20], 0.01[19]	South Korea: 28d PHI as registered for soft citrus and lemons and not later than 90% petal fall for other citrus.
Azinphos-methyl	Codex	1.0	None	Not later than 90% petal fall.
Bromopropylate	EU	0.01	No change	Not later than 90% petal fall. Be sure to avoid application directly to small fruitlets e.g., in situations of unsynchronized blossom.
Carbendazim (Benomyl)[SA1]	EU	0.7[13,20], 0.2[7,19] (0.01[7,19], 0.7[13,20]) EU5	0.7[13,20], 0.2[7,19] (0.01[7,19,13]) EU5	EU5= The latest draft EU regulation for the Carbendazim MRLs include a value of 0.01 mg/kg for oranges, grapefruit and soft citrus. This MRL is likely to apply in Europe by September/October 2025, if adopted. No new MRL was proposed for lemons, the current MRL of 0.7 mg/kg for lemons remains in place. d=Switzerland published a Carbendazim MRL of 0.1 mg/kg on all citrus types. SA1= The on-farm use of Carbendazim (Benomyl) will be phased out in South Africa under Act 36 of 1947 by May 2025.
Chinomethionat	Japan	0.7	0.2[20], 0.7[11]	No change.
Cypermethrin	EU	2.0 (0.005[7], 0.3[13, 20], 0.5[19]) EU1	2.0	Superscript EU1 removed.
Dithiocarbamates	EU	5.0	No change	EU4 = There is ongoing evaluation of the Dithiocarbamate MRLs in the EU. Expected changes are imminent, which will likely only apply in the EU during the first quarter of 2026.
Fenamiphos	Japan	0.04 [13], 0.2[11] (0.01)[J1]	0.01	Superscript J1 removed.
Fluopyram	Japan	1.0	0.4[19], 0.6[7], 1.0[11]	No change.

Citrus Growers' Association OF SOUTHERN AFRICA

MRL update

- European Union
  - Fenpropathrin MRL expected to be lowered to 0.01 mg/kg. The new MRL is only likely to apply from Q2 of 2026 (earliest).
  - Cypermethrin MRL expected to change from Q2 of 2026 (earliest).
- China
  - Pay special attention to the analytical method used to determine 2,4-D residues. The MRLs on citrus are: 1.0 mg/kg for grapefruit and lemons and **0.1 mg/kg for mandarins and oranges.**
- Taiwan
  - Carnauba Wax is approved for use on all citrus with an MRL of 200 mg/kg, effective from 10 May 2025.
- GSO countries
  - Fenpyroximate MRL in GSO countries will adopt CXLs in the future. MRL will change from 0.6 mg/kg for the citrus fruit group, to 0.5 ppm on grapefruit, 1.0 ppm on lemons and none on other citrus **(meaning it should not be detected on mandarins and oranges).**

Citrus Growers' Association OF SOUTHERN AFRICA

MRL update

- Local matters
  - Active substances of concern (1A/1B CMRs) will be phased out end of May 2025
    - Calcium arsenate
    - Carbendazim (benomyl)
    - Certain mineral oils
    - Procymidone
    - Propiconazole
    - Thiacloprid
  - The outcome of Mancozeb's reclassification process will be finalised by the end of May 2025.
  - There are ongoing derogations for essential uses of certain actives, noticeably for spirodiclofen and boron.
  - The Registrar intends to phase out all Highly Hazardous Pesticides (1A/1B CMRs and restricted agricultural remedies) by 2035.

Citrus Growers' Association OF SOUTHERN AFRICA

Pest Control Operator Regulations

- Cutting Edge No. 410 & **414.**
- Phase-in of the regulation is unlikely.
- Requirement will be audited on farms (SIZA, GLOBALG.A.P.).
- New PCO Application Forms of 1 April 2025.
- Citrus Academy is developing a PCO short course tailored for the citrus industry – provisionally available from July 2025.

Citrus Growers' Association OF SOUTHERN AFRICA

Other matters

- Register for Crop Life SA free webinars.

Citrus Growers' Association OF SOUTHERN AFRICA

Date of next meeting

- 27 June 2025

Citrus Growers' Association OF SOUTHERN AFRICA