**“HAVE YOUR SAY” CAMPAIGN               2 March 2022**

**Dear all**

**The goal of this communication is to request that you assist us to stop the new mandatory cold treatment portion of the upcoming EU emergency legislation on False Coddling Moth which threatens the 2022 import season of South African oranges.**

To supply EU customers and consumers with fresh, high quality and affordable oranges, South Africa imports are a necessity in light of being the largest citrus supplier to the EU and is largely counter-seasonal to EU citrus production.  Critically, the EU market access also helps sustain 120 000 jobs in the local industry.  However, new proposed EU regulations on False Coddling Moth (FCM) pose a major threat to South African orange exports to the EU, which could lead to large gaps in the supply chain and higher prices for EU consumers. This new legislation proposes that exporting African countries must implement a drastic mandatory cold treatment (0°C to -1°C for at least 16 days) for oranges headed to the EU.

As a reputable and trustworthy supply chain for more than 100 years, South Africa has remained fully committed to providing EU consumers with healthy, safe and sustainably produced oranges, including complying with all necessary measures to protect European production from the threat of any pest or disease. But this new proposal is disproportionate and unfeasible, for the following reasons:

* It will negatively impact on the quality of the huge volume of all SA oranges arriving in the EU, which will result in less consumption, food waste and revenue losses for all value chain stakeholders. This in a time when oranges became a sought after product to boost immune systems during Covid 19.
* For the SA conventional oranges it implies that, even within cold tolerant cultivars, only a portion of the crop meets specifications necessary to withstand the prescribed temperatures
* The mandatory cold treatment will effectively kill all exports of organic and “chem-free” [non-treated] oranges to the EU, as these products are simply not able to withstand the suggested cold treatment. It’s a shame as these orange types have never recorded a FCM interception and are a popular and growing volume of environmentally friendly and sustainable citrus.

This new EU legislation could be passed and implemented by the end of May 2022, at the start of the upcoming SA citrus season, which will have major consequences for your company and your customers.  
**But you can assist to stop this new legislation by lodging your objection on the European Commission’s “Have Your Say” website at the latest on the 10th of March 2022.**

To protect the continuity of orange imports from South Africa, the year-round availability for EU consumers and the 120 000 jobs the local industry sustains [click here](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13381-Plant-health-changes-to-protective-measures-against-plant-pests_en) and following these simple steps:

1. Create an account:

* Push button "Give feedback"
* Push button "Register"
* Fill in your contact information
* you will receive an e-mail to finish the process of registration

**2.** Give the EU feedback on this "Have your say" opportunity

* Tell your own story (do not "copy paste"), otherwise the EU will see this as one voice/objection)
* Explain who you are and how you are involved in the SA citrus trade (importer, retailer etc.)
* Specify whether you have a specific stake in organic or chem-free oranges
* If possible, give figures about the size of your business and how much is at stake for you
* Importer: describe your "track record": how many years have you been importing oranges (from mainly SA), do you work with the same producers for a long time (dedicated supply chains) and how many rejections of shipments have you had? If zero, or very few: why be forced to unnecessary apply such a strict cold treatment to all oranges (and/or maybe other citrus fruits in the future….)
* If applicable, explain your experience with cold damage to date, and how it would get worse with the new mandatory requirement.
* Explain how you expect this new requirement to impact your business (losses due to damage, losses due to closure of organic or chem-free trade…)
* Tell the European Commission that this proposal is damaging and not necessary, because there are already effective alternative cold treatments in the SA FMS protocols in place.
* Tell the European Commission that if they insist on regulating this, they must:
  + Include alternative time/temperature protocols, which are already in use with South Africa, are just as effective, but will not kill the organic and chem-free trade or create massive cold damage to specific varieties.
  + Even so new legislation should be given enough time to be planned in implemented. It’s virtually impossible to implement 2 different sets of import requirements within the same season. Date of entry should at least be the next season (2023).
* Retailer: Emphasize strong demand from consumers: high quality fruits / need to increase consumption of fresh fruits & vegetables / importance of a year-round supply of a varied assortment.

**Remember the deadline for submissions is 10th of March 2022.**

**Once you lodge your comments on the EU website, please forward it to the following confidential CGA email address, where only the number of objections will be used to effectively motivate the voting down of the mooted cold treatment:** [haveyourFCMsay@cga.co.za](mailto:haveyourFCMsay@cga.co.za)

**Most importantly, we also request that you to send this communique (and a copy of your submission) to your EU clients and stakeholders and request them to also make a submission on the “Have Your Say” website. Could you also request that they share their objections with you or the email address above – so these can be added to our total, for communication purposes.**

Groetnis/Kind regards

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