BCI MONITOR

BRYANT CHRISTIE INC.

JUNE 24, 2025

INSIDE THIS ISSUE

A REPORT FOR THE CALIFORNIA CHERRY BOARD

SPECIFIC ISSUES OF INTEREST TO THE CCB:

USDA Reports on Cherry Production in Poland

- Poland's 2025/26 (April-March) sweet cherry production is forecast at just 35,000 metric tons (MT), down 30% from the previous year and over 50% below the six-year average, according to a recent USDA GAIN report.
- Severe frosts from March through May 2025 significantly damaged early sweet cherry varieties, causing localized losses of up to 90%. A mild winter increased pest threats, while spring frosts, hail damage, dry soil conditions, and poor pollination further strained orchards.
- Following a 26% year-over-year decline in sweet cherry production in 2024/25 (estimated at 51,000 MT), Poland imported 3,253 MT of sweet cherries to compensate - 15 times more than in the previous year. Imports came primarily from Hungary, Moldova, and Serbia, with expectations of further increases in 2025/26 due to domestic shortages.
- Over the past 15 years, Poland has risen to become one of the top cherry producers in the EU, following only Italy, Spain, and Greece. However, with two consecutive poor harvests, Poland's position is weakening. Industry voices have warned that continued shortfalls may strain long-term trade relationships and erode Poland's competitiveness in the EU fresh cherry market.

Japan Adopts Revisions to Quarantine Pest List

- On June 23, Japan's Ministry of Agriculture, Forestry and Fisheries (MAFF) notified the WTO of finalized revisions to the *Ordinance for Enforcement of the Plant Protection Act* regarding quarantine pests.
- In March, MAFF notified a summary of the proposed revisions (*BCI Monitor 3-18-25*).
- The changes do not include any of direct relevant to fresh cherries from the U.S.

GENERAL ISSUES OF INTEREST TO THE CCB:

Japan Publishes Revised Q&A on Positive List System

- On June 20, Japan published a revised Q&A document regarding its positive list system (both in Japanese) for food utensils, containers, and packaging.
- The positive list system recently entered into force on June 1 and as previously reported, if a plastic material does not appear on the positive list, then it cannot be in any food contact material used in the country (*BCI Monitors 6-27-23, 5-7-24, 1-14-25, 5-27-25*).
- For more information, the landing page (in Japanese) for the positive list system includes the revised Q&A documents, English translations, and other various administrative notices related to implementation of the system.

Bryant Christie Inc. – Seattle
2033 Sixth Avenue, Suite 1030
Seattle, WA 98121
Phone: (206) 292-6340 Fax: (206) 292-6341

Bryant Christie Inc. – Sacramento
2005 "I" Street, Suite 200
Sacramento, CA 95811
Phone: (916) 492-7062 Fax: (916) 492-7061

India Gazettes Draft Amendments to Plastic Waste Management Rules

- On June 3, India's Ministry of Environment, Forest, and Climate Change gazetted draft amendments (in English starting p. 5) to its *Plastic Waste Management Rules, 2016* (as modified in 2018). The draft amendments:
- (Schedule II, 7.2 & (d&i)) Require producers to ensure the use of recycled plastic in plastic packaging, based on the plastic packaging category (descriptions of each category):
    - Category I: 30% by 2025-26, 40% by 2026-27, 50% by 2027-28, and 60% by 2028-onwards.
    - Category II: 10% by 2025-26, 10% by 2026-27, 20% by 2027-28, and 20% by 2028-onwards.
    - Category III: 5% by 2025-26, 5% by 2026-27, 10% by 2027-28, and 10% by 2028-onwards.
- (Schedule II, 7.3 & (d)) State that recycled plastic used in imported materials does not count toward the fulfillment of the obligations above. Instead, the importer can fulfill its obligation through the purchase of a certificate of equivalent quantity from producers, imports, or brand owners who have used recycled content in excess of their obligation. The Central Pollution Control Board will develop a mechanism for such an exchange on its centralized online portal.
- (Schedule II, 7.4 (I)) Require brand owners using category I plastic packaging to reuse such packaging as follows:
    - Volume/weight= 0.9 l/kg – 4.9 l/kg: 10% by 2025-26, 15% by 2026-27, 20% by 2027-28, and 25% by 2028-onwards.
    - Volume/weight= equal or more than 4.9 l/kg use for products other than drinking water: 10% by 2025-26, 10% by 2026-27, 15% by 2027-28, and 15% by 2028-onwards.
    - The quantity reused must be calculated by reducing the virgin plastic packaging manufactured/imported/purchased in that year from the sales of the brand owners.
- For each amendment above, if these obligations cannot be met on account of statutory or technical requirements, exemptions may be granted by the Central Pollution Control Board.
    - Statutory requirements mean the case where the use of recycled content is not allowed by any other law in force.
    - Technical requirements mean the case where use of recycled content renders the packaged material unfit for use (ex: use of recycled content in plastic food contact materials).
- Additionally, for each amendment above, producers/importers/brand owners may carry forward any shortfall in fulfilment of mandatory recycled plastic use in plastic packaging for 2025-26 for a period of three years starting from 2026-27 by achieving above the target percentage mandated for those years.
- Comments are due by August 2, 2025, and can be emailed to sohsmd-mef@gov.in.

India Opens Consultation on Revised Plastic Food Packaging Guide

- The Bureau of Indian Standards (BIS) recently opened a public consultation on a revised Guide on the Suitability of Plastics for Food Packaging.
- The standard covers various single or combination thermoplastics considered suitable for direct food contact applications, providing general guidance on selecting specific thermoplastic materials.
- The revised guide:
    - Deletes certain thermoplastics such as vinyl chloride-vinyl acetate and nitrocellulose for use in direct contact with food.
    - Adds additional food products included under various categories.
    - Adds Annex B to provide the full form of abbreviations of polymers used.
    - Replaces paraffin wax with food contact grade compliant wax and acrylic with ethylene acrylic acid.
    - Adds additional thermoplastics such as polyethylene wax and cyclic olefin copolymer for use direct contact with food.
- Comments are due by July 26, 2025, and may be submitted via the BIS online portal. The final draft is expected by December 2025 and gazettal by May 2026.

South Korea Publishes Draft Revision to Labeling Standards for Barcodes

- On June 17, South Korea's Ministry of Food and Drug Safety (MFDS) published *Announcement No. 2025-274* (in Korean).
- According to machine translation, the draft revisions pertain to food labeling provided electronically through barcodes such as QR codes. The revisions specify the display method for electronic labeling information and the display format for codes on product packaging.
- Comments are due by July 7, 2025, and may be submitted to MFDS at aeiou2001@korea.kr.

EU Publishes Re-Assessment on Risks of Styrene in Food Contact Materials

- On June 10, the European Food Safety Authority (EFSA) published a re-assessment of the use of Styrene in plastic food contact materials (FCM) (*BCI Monitor 1-7-25*).
- EFSA's Food Ingredients & Packaging Unit concluded that styrene's use in plastic FCM with a Specific Migration Limit (SML) of 40 µg/kg in food is not a safety concern.
- Styrene is listed on the European Union's *Commission Regulation (EU) No. 10/2011* on plastic FCMs but lacks a SML. As such, EFSA's conclusion is the first step in establishing one to regulate the substance.