BCI MONITOR

BRYANT CHRISTIE INC.

SEPTEMBER 1, 2026

INSIDE THIS ISSUE

A REPORT FOR THE CALIFORNIA CHERRY BOARD

SPECIFIC ISSUES OF INTEREST TO THE CCB:

Taiwan Notifies Draft Amendment to Plant Quarantine Requirements

- On September 1, Taiwan notified the WTO of a draft amendment to its *Quarantine Requirements for the Importation of Plants or Plant Products*. The draft includes several changes to pest listings, host countries, and plants.
- Notably, the species being removed from the quarantine pest list include *Grapholita molesta* (Oriental fruit moth), a known pest of *Prunus* species including cherries. The notice does not specify whether this deletion is tied to any change in current import conditions for cherries specifically.
- The proposed dates of adoption and entry into force of the changes have yet to be determined.
- Comments can be sent to the U.S. SPS Enquiry Point at us.spsenquirypoint@fas.usda.gov. The WTO comment deadline is October 31, 2026.

GENERAL ISSUES OF INTEREST TO THE CCB:

Chile Secures Improved Market Access Conditions for Cherry Exports to Vietnam

- On August 27, Chile's Ministry of Agriculture reported (in Spanish) an agreement with Vietnam to allow Chilean fresh cherries to enter without cold treatment, following a meeting between Chile's Undersecretary of Agriculture and Vietnam's Deputy Minister of Agriculture and Environment.
- The agreement approved the use of a Systems Approach as an alternative to cold treatment. The Systems Approach utilizes risk-mitigation measures applied across production and handling and is intended to give exporters more flexibility for both air and sea shipments.
- Vietnam is a growing market for Chilean cherries, with import value climbing from about $85,000 in 2020 when it gained market access to nearly $13 million in 2025. Chile is Vietnam's second-largest supplier by value behind the United States.

USDA Provides Guidance on Vietnam's Tightening Origin-Labeling Requirements

- On August 26, the U.S. Department of Agriculture Foreign Agricultural Service (USDA FAS) published a GAIN report providing guidance on Vietnam's *Decree No. 37/2026/ND-CP*, which took effect on January 23, 2026, tightening origin-labeling requirements for imported foods and agricultural products entering Vietnam.
- The decree implements a 2025 amendment to Vietnam's Law on Quality of Goods and Products and consolidates labeling requirements.

(Continued on next page)

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

USDA Provides Guidance on Vietnam's Tightening Origin-Labeling Requirements (cont.)

- Article 42 of the decree mandates food labels to state the product name, country or territory of origin, full or abbreviated name and address of manufacturer or responsible entity in country of origin, along with quantity, manufacturing and expiry dates, ingredients, nutritional value, usage and storage instructions, and any applicable warnings.
- Origin must appear on the good's original physical label using one of seven accepted phrases ("Made in," "Product of," "Manufactured by," and similar) followed by the country or territory name, which may be abbreviated per Vietnam Standard TCVN 7217-1 (e.g., "US" or "USA"). If the origin cannot be shown this way, the label may instead cite the location of the good's final finishing stage (e.g., "Packed in," "Assembled in"). Exporters whose original labels lack origin information may affix a sticker displaying the origin to the goods or their commercial packaging before the goods enter Vietnam, provided the sticker is securely attached and clearly legible.
- If the manufacturer's name and address are not fully shown on the original label, that information must instead appear in an accompanying shipment document. Imported goods whose labels lack complete Vietnamese-language content must carry a supplementary Vietnamese label alongside the original, with content matching exactly.

Health Canada Consults on Proposed Mandatory Food Packaging Framework

- Health Canada has opened a stakeholder consultation on a high-level proposal to require mandatory notification of food contact materials (FCMs), a shift from the current system in which premarket assessment is only conducted when a request is voluntarily submitted. Comments are due October 9, 2026.
- Under the proposed framework, notifications would be required for the parts of finished food packaging that directly contact food or that may migrate chemicals into food. Health Canada is also considering who along the supply chain, such as finished packaging manufacturers, importers, brand owners, or retailers, should bear responsibility for submitting notifications.
- Health Canada states the proposal is intended to increase oversight of food packaging chemicals in anticipation of growing use of recycled plastics and alternative packaging materials. The agency proposes a roughly five-year phase-in period following any final framework.
- This consultation does not currently appear on Health Canada's public consultations webpage and is believed to have been distributed directly to stakeholders. Background on Health Canada's existing food packaging assessment process is available through its food packaging and distribution webpage.

EU Opens Consultations on Recycled Content, Import Equivalence, and Recycling Technology Rules Under Packaging Regulation

- On August 14, the European Commission opened three Calls for Evidence on technical rules implementing Article 7 of *Regulation (EU) 2025/40 on packaging and packaging waste*, following the regulation's first phase of enforcement (*BCI Monitor 8-4-26*).
- The first, an implementing act under Article 7(8), would set uniform rules for calculating and verifying recycled content in plastic packaging. This act intends to reduce the administrative burden of complying with the requirement across the EU, give the recycling industry legal clarity to invest, and help businesses properly implement their recycled-content obligations.
- The second, an implementing act under Article 7(10), would establish methodological rules to assess, verify, and certify that plastic materials collected or recycled in non-EU countries meet a standard equivalent to the EU's own system for such materials.
- The third, a delegated act under Article 7(9), would establish sustainability criteria for plastic recycling technologies, intended to help ensure that recycled plastic used in packaging delivers the greatest possible environmental benefit.
- The Commission is specifically seeking data on the estimated annual volume of recycled content imported into the EU by polymer type, the share of EU packaging originating from third countries, and the main source countries of that material. It is also seeking information on the verification, certification, and chain-of-custody schemes currently used to trace recycled content back to collected or recycled post-consumer plastic waste.
- Feedback can be submitted via the Have Your Say portal through the links above until September 16, 2026.

USDA Publishes Stone Fruit Annual Reports for Taiwan, Chile

- The U.S. Department of Agriculture Foreign Agricultural Service (USDA FAS) recently published stone fruit annual reports for Taiwan and Chile, assessing cherry production, consumption, and trade data. Notable developments are covered below.
- Taiwan
  - Taiwan does not produce cherries because its subtropical climate is not suitable for cherry production. Domestic demand relies entirely on imports.
  - Cherries ranked as Taiwan's fourth-largest imported fruit by volume and second-largest by value in Market Year (MY) 2025/26 (April-March), at $174 million (about 17 percent of total fruit imports). Imports reached a record 23,725 metric tons (MT), driven by Chilean oversupply rather than an increase in demand.
  - USDA forecasts imports will stabilize at 19,500 MT in MY 2026/27. The decline reflects a stronger U.S. dollar, an earlier harvest season, a realignment of international supply, and a strong domestic summer fruit harvest.
  - The U.S., Chile, and New Zealand are the top cherry suppliers to Taiwan. The U.S. and Chilean export volumes both exceeded 10,000 MT for the first time in MY 2025/26, with New Zealand's supply remaining stable at 1,000-2,000 MT. The U.S. remains the leading supplier during the summer season.
  - Cherries were traditionally a summer import, but gift-giving around Lunar New Year and year-end has pushed winter consumption above summer consumption, at 53 percent versus 47 percent.
  - U.S. and Chilean cherries (HS 0809.29) enter Taiwan at its 7.5 percent most favored nation (MFN) tariff rate. Cherries from New Zealand enter duty-free under its Economic Cooperation Agreement with Taiwan.
  - U.S. fresh fruits exported to Taiwan require an APHIS-issued phytosanitary certificate (PPQ Form 577); Taiwan's plant health authorities no longer accept other certificate types. Because cherries are a minor crop in Taiwan, USDA recommends that U.S. exporters and producer groups monitor Taiwan's pesticide application trends and encourage pesticide manufacturers to proactively pursue import tolerances, since the approval process can take two to three years.
- Chile
  - Cherries remain Chile's largest fruit crop by planted area. USDA projects planted area will reach 80,000 hectares (approximately 197,600 acres) in MY 2026/27 (November-October), up from 77,766 hectares (192,200 acres) in MY 2025/26, as growers shift focus from new acreage to productivity and variety renewal.
  - USDA forecasts Chilean cherry production will reach a record 727,000 MT in MY 2026/27, a 16 percent increase over MY 2025/26. The growth reflects new orchards reaching commercial maturity under normal growing conditions.
  - Chilean cherry exports fell an estimated 9 percent to 569,492 MT in MY 2025/26, following an exceptional 51.1 percent jump the prior year to a then-record 625,208 MT. The decline is attributed to a normalization of production rather than reduced capacity, along with logistical strain from large volumes arriving in China within a short window.
  - USDA forecasts exports will rebound to 667,000 MT in MY 2026/27 on continued Chinese demand and higher-yielding new orchards, though growth should remain moderate given market absorption and logistics constraints.
  - China received approximately 87 percent of Chile's cherry exports in MY 2025/26. Chile is pursuing diversification through new air shipments to Vietnam, a Walmart pilot program in the United States, and ProChile promotions.
  - Domestic consumption is forecast at 60,000 MT in MY 2026/27, about 8 percent of production, as roughly 90 percent of the crop is exported.
  - USDA reported no cherry policy updates for Chile in this reporting period.