



2021 Global MRL  
Harmonization Workshop

*China MRL Policy  
Overview – An  
Industry’s View*



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# Agenda

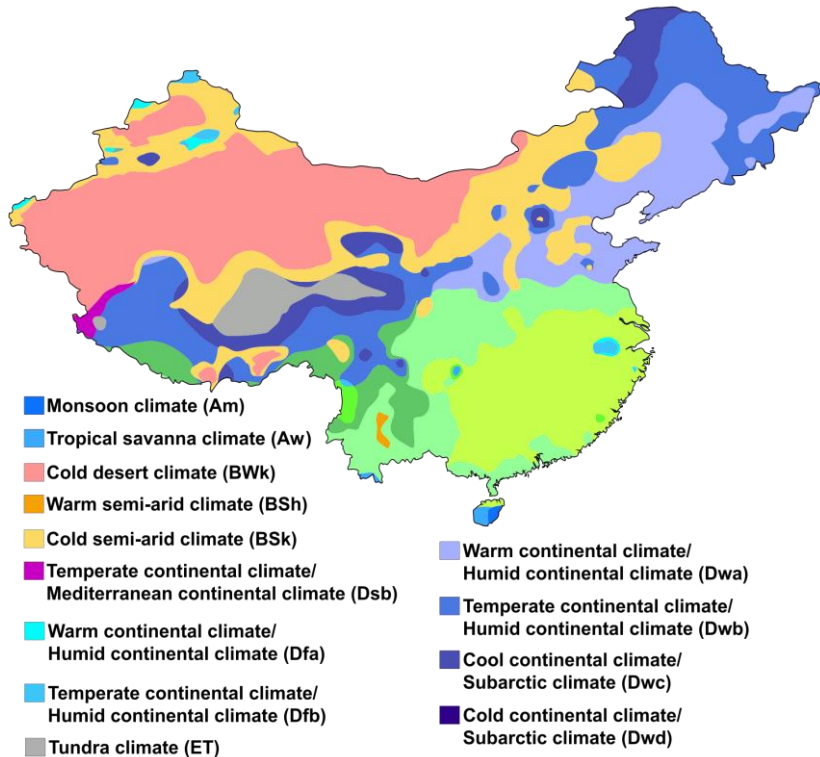
- // China Agriculture Landscape
- // Management and Establishment of National MRLs
- // Current Situation of MRLs in China
- // China Import Tolerance Policy Update



# Agriculture complexity in China

China agriculture industry is extremely fragmented with high geographic and crop differences.....

*Crop complexity builds from.....*



Crop type (70+)



Field Size

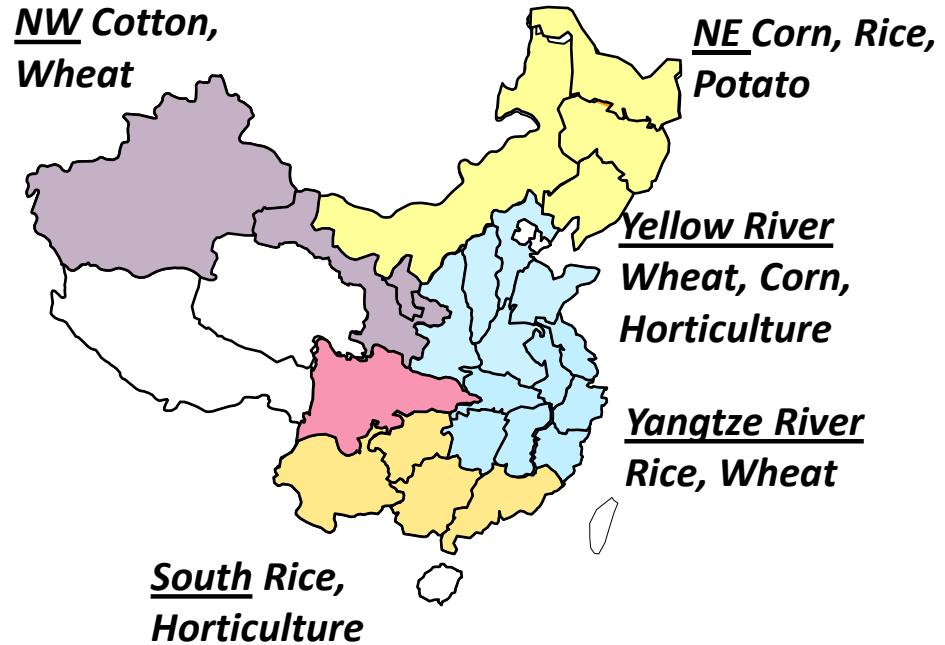


Cultivation Behavior



**NW Cotton,  
Wheat**

**NE Corn, Rice,  
Potato**

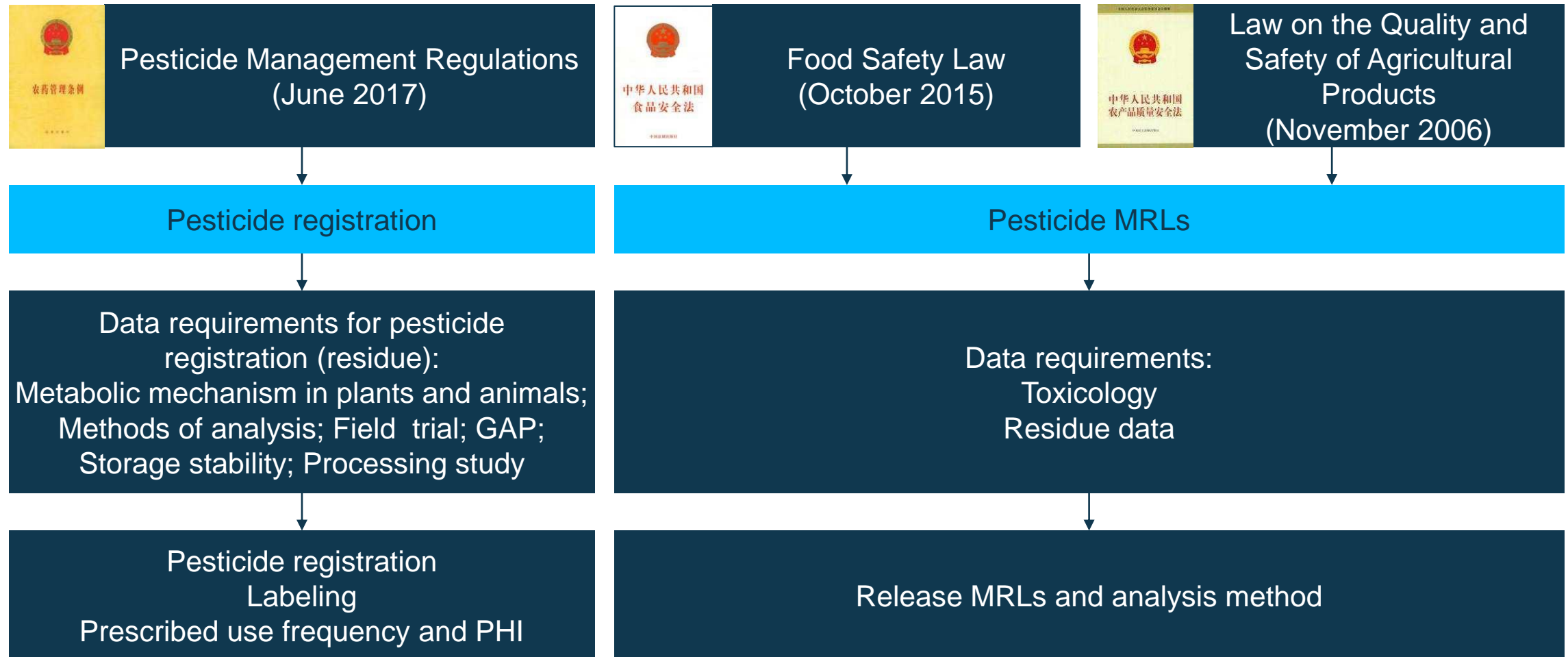


*Big and fragmented.....distinct seasonality by crop and geography.*



# Pesticide Residue Related Laws and Regulations

Pesticide registration and MRL establishment are two parallel procedures





# Work Process of Pesticide Residue Standards

## National Standards Review Committee for Food Safety (renewed on July 12, 2019)

// 14 professional committees, including one on pesticide residue

## National Standards Review Committee for Pesticide Residue (renewed on April 21, 2016)

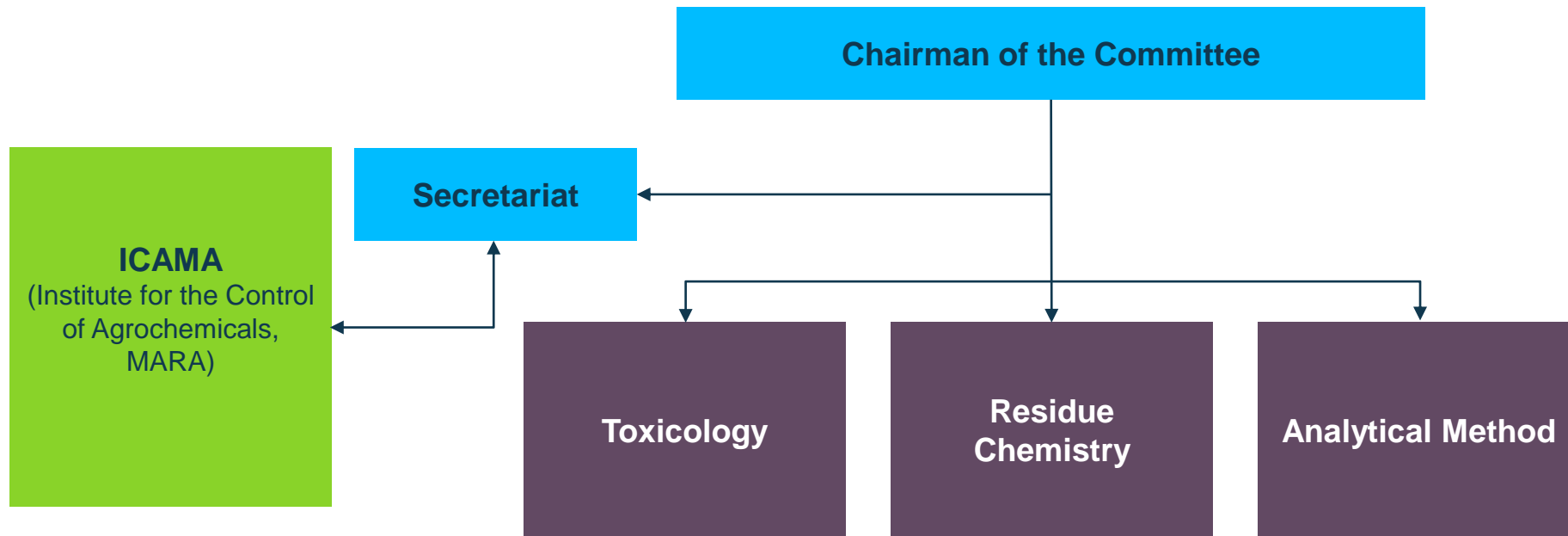
- // The Ministry of Agriculture and Rural Affairs (MARA) is responsible for the establishment and daily management and work of this specialized committee on Pesticide Residues
  - // MARA is responsible for the pesticide residues limits management, organizing the National Standards Review Committee for Pesticide Residue to review the pesticide residue limits standards, and release the draft for public opinions.
  - // The National Health Commission (NHC) and MARA will jointly promulgate and abolish standards on pesticide residue limits, testing methods and procedures.

**Responsibility** Review national standards of pesticide residues, review plan for the establishment and revision of national pesticide residue standards and long-term program, put forward suggestions concerning the implementation of policies of pesticide residue standards and technical measures, and provide consultation to major issues related to national pesticide residue standards.



# National Standards Review Committee for Pesticide Residue

- // Chairman, Vice Chairman, Secretary General and Deputy Secretary-General are designated administrative positions from different agencies.
- // Total 60 members split into three expert panels in Toxicology, Residue Chemistry and Analytical Method: 53 expert members from different institutes/universities; and 7 members represent the different agencies including Health, Quality Inspection, Food and Drug, Grain, National Standards Committee, Accreditation and Certification Commission and China Consumer Association.





# Current MRLs Established in Foods

## New National Standards GB 2763-2021

- // 10,092 MRLs covering 564 pesticides in around ~376 crops or foods (groups) have been established and will start implementation on September 3, 2021.
- // Compared with version GB2763-2019:
  - // 2,985 MRLs for 81 pesticides were added which fully cover the approved use of pesticide and major agricultural products in China;
  - // 792 MRLs for 29 banned pesticides and 345 MRLs for 20 restricted pesticides have been set;
  - // 5,766 MRLs on vegetables and fruits are set and revised;
  - // 1,742 MRLs for 87 pesticides which are not registered in China have been established for the import use.

Source: [http://www.moa.gov.cn/xw/zwdt/202104/t20210401\\_6365132.htm](http://www.moa.gov.cn/xw/zwdt/202104/t20210401_6365132.htm) (Chinese)



# MARA is expected to formulate and publish Import Tolerance policy in future, but unsure of the timeline

Based on our best understanding

- // ICAMA has submitted the draft IT regulation to Bureau of Quality and Safety Supervision for Agro-products.
- // The government plan is that Bureau of Quality and Safety Supervision for Agro-products will organise meeting to discuss on the draft IT regulation with other MARA departments:
  - // Crop Production Department
  - // ICAMA
- // Until today, the meeting has not been organized yet as the IT regulation is clearly no longer a priority for MARA and NHC
- // Once the internal government discussion process is complete and final draft IT regulation is ready, it will be released for public comment.
- // Due to the general election of Committee for Pesticide Residues, the timetable for IT regulation released for public opinion is uncertain..





# Current Chinese Position – One MRL standard in China

Based on our best understanding

- // While timing is unclear for a regulation, Chinese government remains open to the establishment of IT / MRL regulations.
- // Current position is that there will only be one MRL standard in China. There will not be dual standards with one for domestic produce and another standard for imported produce. The IT regulation will mainly address the missing MRLs.
- // China is open to modify the China MRL standard if it is necessary. However, there's no mechanism for registrant to apply for adjustment on mis-aligned MRLs.
- // China will continue to consider adoption of Codex MRLs into their national standard on an 'ad hoc' basis.
- // In the future, the work on MRL/IT regulations will not stop but continue according to their work priority.



## What is next?

- // Continue to have dialogues with Chinese regulators and monitor the policy development closely.
- // In the meantime, we believe trade can continue as status quo despite the uncertainty.
- // In the absence of a separate import MRL regulation, the National Food Safety Law (Article 93) and the Regulations on the Administration of Food Licensing without National Food Safety Standards for Imports may provide an umbrella mechanism for traders to use exporting country's standards or international standards to request a (temporary) standard to cover residues of pesticides in commodities that have no established food safety standard in China. However, as there is **no precedent** case yet to trigger the procedure, authority is not able to comment more on the actual administration steps in managing missing MRLs.
- // Industry comments during the public comment period will be welcome.



*Thank you!*

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