

Authority Consultation Feedback on Temporary MRL of Fosetyl-aluminium in Grape



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PART 1 Background

In *GB 2763 National Food Safety Standard for Pesticide MRL in Foods*, pesticide fosetyl aluminium's MRL in grape is 10mg/kg which is a temporary upper limit. In 2018, Codex set the MRL of fosetyl aluminium in grape at 60mg/kg. Up to March 2021, China had not revised the MRL of fosetyl aluminium in grape. REACH24H was entrusted by Australian Grape and Wine Incorporated to consult the authority regarding the MRL of fosetyl aluminium in grape.

PART 2 Implementation process

2.1 Solution research phase (March 3^r – March 8th, 2021)

We did solid research and explored different ways to get useful authority advice.

- a) firstly, analyze the regulatory progress and status of pesticide residue of fosetyl aluminium, such as time of its appearance in standard, time of its temporary MRL in grape being added in standard, domestic and overseas regulations on it, safety data and other studies.
- b) secondly, look into amendment procedure of temporary MRL, reach out to official and key contacts by different means, seek official opinion from different angles (including enterprise, individual, industry stakeholder).
- c) formulate work schedule.

2.2 Implement phase (March 8th to April 5th, 2021)

- a) Regulatory research: fosetyl aluminium pesticide residue appeared in GB 2763-2012 for the first time, three temporary MRLs of fosetyl aluminium were set for cucumber, apple and lychee respectively; in GB 2763-2016, its temporary MRL in grape was added to the standard, and in GB 2763-2019, no change to fosetyl aluminium residue. On March 18th, 2021, National Health Commission (NHC), State Administration for Market Regulation (SAMR) and Administration of Agricultural and Rural Affairs (MOARA) jointly announced publication of GB

2764-2021, the standard will come into effect in September 2021. The full text of GB 2764 has not been made available so far.

- b) Contact competent authority and key contacts, according to division of powers and duties of different departments, narrow down scope to key agencies under competent authorities: MOARA Plant Management Department, Institute for the Control of Agrochemicals (ICAMA), MOARA Agricultural Products Quality Control Department, National Pesticide Registration and Evaluation Committee, National Pesticide Residue Standard Evaluation Committee, National Center for Food Safety Risk Assessment.
- c) According to China Food Safety Law, China Agricultural Product Quality and Safety Law, Administrative Provisions on Pesticide, Food Pesticide Residue Risk Assessment Guideline, Food Pesticide MRL Formulation Guideline, draft email of authority consulting and develop call consulting plan and comprehensive content.
- d) Consult above departments or institutes respectively, firstly by sending an official email, and then contact them by phone call, gather feedbacks.

2.3 Project conclusion (March 20th – April 5, 2021)

Complete authority consulting report and provide targeting advice.

PART 3 Feedbacks of Authority Consulting

On March 24th, 2021, we received an official telephone reply from the Secretariat of the National Pesticide Residue Standard Evaluation Committee.

3.1 The temporary limit of Fosetyl-aluminum in grape came from the data of pesticide registration.

The official reply pointed out the pesticide residue limit is closely related to the real use of pesticides. Apart from the theoretical indicators such as toxicity and effectiveness, to make and modify a specific pesticide residue indicator, it should be based on the registration and the real use of pesticides.

Also, they were aware of JMPR's assessment of Fosetyl-aluminum and its residue indicators in the CAC. However, at present, there is only one Fosetyl-aluminum product used for grapes in China, and its actual application is very limited which means

- a) It is not widely used and the country lacks the necessity to adjust the indicators of this pesticide residues.
- b) The quantity is too small to be attached great importance.
- c) There lacks data of real residue of Fosetyl-aluminum in grape, and therefore lacks sufficient supportive data to amend this index.

The following table shows the pesticide registration information of Fosetyl-aluminum used in grape.

Reg. No	Name	Category	Product form	Total content	Valid through	Certificate owner
PD20140278	Fosetyl-aluminum	fungicide	Water dispersible granule	80%	Feb 12, 2024	江阴苏利化学股份有限公司

3.2 At present, there is no national standardized test method for Fosetyl-aluminum, so it can only be temporarily limited.

The official said that at present, there is no unified and reliable national test method for the detection of Fosetyl-aluminum residue in China.

Once the pesticide residue limit is set, in fact, it needs to be controlled by the authority, and requires an accurate universal test method to detect it. If it cannot be detected, it cannot be effectively controlled, and the setting of limit is meaningless.

For now, the lack of test methods for Fosetyl-aluminum residue means it is not feasible to adjust its temporary limit to the formal limit.

3.3 Considering there are many other kinds of grape fungicides approved in China, the official suggested that these fungicides should be used in combination to reduce the use amount of any single fungicide.

The official also said that China has already approved a wide variety of fungicides for grapes, and grape growers can choose to use any of them on their own. If the grape planting enterprises worry about the excessive Fosetyl-aluminum residue, they can reduce the use

amount, and choose other approved fungicides rather than insisting on the use of Fosetyl-aluminum.

3 REACH24H Advice

3.1 Advice one

It is suggested to encourage pesticide manufacturers to go for Fosetyl-aluminum pesticide registration with grape as the applicable scope. Its wide application in grape in the industry will prompt the amendment to MRL. This is the most critical and helpful step towards MRL revision of Fosetyl-aluminum in grape.

3.2 Advice two

It is suggested to partner with testing agencies, manufacturers of Fosetyl-aluminum pesticide and relevant industry associations to research and develop test method of Fosetyl-aluminum residue.

4 Regulatory References

GB 2763-2005 National Food Safety Standard for Pesticide MRL in Foods

GB 25193-2010 MRLs of Chlorothalonil and other 11 pesticides in foods

GB 26130-2010 MRLs of Paraquat and other 53 pesticides in foods

GB 28260-2011 National Food Safety Standard MRLs of 85 pesticides including avermectin

GB 2763-2012 National Food Safety Standard for Pesticide MRL in Foods

GB 2763-2014 National Food Safety Standard for Pesticide MRL in Foods

GB 2763-2016 National Food Safety Standard for Pesticide MRL in Foods

GB 2763.1-2018 National Food Safety Standard for MRLs of 43 pesticides including paraquat

GB 2763—2019 National Food Safety Standard for Pesticide MRL in Foods

GB 2763-2021 National Food Safety Standard for Pesticide MRL in Foods

Food Pesticide Residue Risk Assessment Guideline

Food Pesticide MRL Formulation Guideline

Notice of public consultation on 2021 pesticide residue revision project

Letter No. 76 (2020) Public consultation on GB standards of pesticide residue test methods

Letter No. 92 (2020) Public consultation on pesticide MRL standards and norms of tracing evaluation
